

Attachment 1

0001

VOLUME 5 - SEPTEMBER 10, 2002

STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS

PUC DOCKET NO: P-421/CI-01-1371

OAH DOCKET NO. 7-2500-14486-2

In the Matter of a Commission Investigation
into Qwest's Compliance with Section 271(c)(2)(B)
of the Telecommunications Act of 1996; Checklist
Items 1, 2, 4, 5, 6, 11, 13 and 14

Minnesota Public Utilities Commission
350 Metro Square Building
121 Seventh Place East
St. Paul, Minnesota

Met, pursuant to notice, at 9:00 in the
morning on September 10, 2002.

BEFORE: Judge Richard C. Luis
REPORTER: Janet Shaddix Elling

SHADDIX & ASSOCIATES (952)888-7687 1(800)952-0163

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APPEARANCES:

JASON TOPP, Attorney at Law, Qwest
Corporation, 200 South Fifth Street, Room 395,
Minneapolis, Minnesota 55402, and ROBERT CATTANACH
and SHANNON HEIM, Attorneys at Law, Dorsey &
Whitney, 220 South Sixth Street, Suite 1700,
Minneapolis, Minnesota 55402, and CHUCK STEESE,
Attorney at Law, 6400 South Fiddlers Green Circle,
Suite 1710, Denver, Colorado 80111, appeared for
and on behalf of Qwest Corporation.

PRITI PATEL and GINNY ZELLER, Assistant
Attorneys General, 525 Park Street, Suite 200,
St. Paul, Minnesota 55103-2106, appeared for and
on behalf of the Department of Commerce.

CECILIA RAY, Attorney at Law, Moss &
Barnett, 90 South Seventh Street, Suite 4800,
Minneapolis, Minnesota 55402, appeared for and on
behalf of the CLEC Consortium.

LESLEY JAMES LEHR, Senior Attorney, 638
Summit Avenue, St. Paul, Minnesota 55105, appeared
for and on behalf of WorldCom.

REBECCA DeCOOK, STEVEN WEIGLER, LETTY
FRIESEN and RICHARD WALTERS, Attorneys at Law,
1875 Lawrence Street, 15th Floor, Denver, Colorado
80202, appeared for and on behalf of AT&T.

14 out of this document.

15 JUDGE LUIS: You may do that.

16 THE WITNESS: Thank you. All ILECs are
17 required to provide access to loop information
18 either through a mechanized or a manual process
19 based on how they provide it to themselves. The
20 database that contains the loop makeup information
21 is called LFACS, that's L-F-A-C-S, and it stands
22 for loop facility and assignment control system.
23 Essentially that is the basis for provisioning and
24 assignment of all loop plant and Qwest uses it for
25 that purpose as well.

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1 For the purpose of loop qualification,
2 both for ourselves and for CLECs, we feed that
3 data into a loop qualification database, which
4 will be called LQDB many times, and that is the
5 database that is actually accessed by all the
6 tools to get loop information. One of the fields
7 in that database is called MLT distance. And MLT
8 distance is a loop length that's determined when
9 an MLT test is performed, and that particular
10 length is then populated into that database. The
11 loop length is not, to Qwest's opinion, always
12 accurate, we believe it can be overstated by as
13 much as 20 percent; however, we do provide that in
14 our raw loop data query response.

15 The reason that that's important is
16 because when the loop qualification database was
17 created there was limited information at that time
18 on some of the loops, on some of the segment
19 lengths. In an attempt at that point to update
20 the information with at least some information
21 regarding loop length, Qwest, at that time
22 U S WEST, embarked on an activity to do kind of a,
23 I'd say a limited MLT test. And what they did is
24 they created a process by which only a certain
25 subset of fields were provided, and they are the

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1 verification code that determines whether it's a
2 good MLT or not, date and time stamp, telephone
3 number and loop length. And that loop length was
4 then input into that loop qualification database.

5 That process does continue, so the MLT
6 distance is continually updated on a rolling
7 monthly basis. The way that it's done, however,
8 is not on every loop, we don't provide or perform
9 an MLT test on every loop. What we do is we
10 perform this limited MLT, which performs an MLT
11 and then immediately drops the customer so that it
12 is less invasive to the end user customer, and
13 then it actually performs an MLT on only one loop
14 in a customer serving terminal. That distance is
15 then adjusted because of all the other loops that
16 might be in that serving terminal, and then that

17 particular distance is applied to all of the loops
18 in that serving terminal, thereby performing a
19 test once and being able to use that result across
20 many loops.

21 And as a result, like I said, this
22 information then, the MLT distance information, is
23 currently in the loop qualification database, and
24 is equally available to both Qwest personnel and
25 CLECs at the same time. And that concludes my

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1 summary.

2 MR. STEESE: Your Honor, one more
3 question. Again, I would consider this outside of
4 the traditional evidence and part of the offer of
5 proof.

6 BY MR. STEESE:

7 Q Ms. Brohl, looking at what has been marked but not
8 admitted as Exhibit 50, have you had occasion to
9 read the remainder of that material that's in
10 Exhibit 50?

11 A Yes.

12 Q To the extent that questions were propounded of
13 you on the record, would your testimony support
14 each and every allegation contained herein?

15 A Yes.

16 MR. STEESE: At this point in time Qwest
17 would make Ms. Brohl available for
18 cross-examination.

19 JUDGE LUIS: All right. Thank you.

20 Ms. Friesen, would you be examining this witness
21 for AT&T?

22 MS. FRIESEN: Your Honor, we would like
23 Ms. Doberneck to take the lead, and Ms. DeCook,
24 who is on the phone, will follow up.

25 JUDGE LUIS: Yes. Ms. Doberneck first

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1 then.

2 MS. DOBERNECK: Thank you, Your Honor.

3 CROSS-EXAMINATION

4 BY MS. DOBERNECK:

5 Q Good afternoon, Ms. Brohl.

6 A Good afternoon.

7 Q I am glad you are finally on the stand and ready
8 to go.

9 Now, currently Qwest offers only a line
10 shared ADSL product; is that right?

11 A To itself or to CLECs? I'm not really
12 understanding what you mean by that.

13 Q To its own retail customers.

14 A Actually, it provides -- it's not really an ADSL
15 service, it's called RADSL, it's rate adaptive
16 DSL, and it is a service that provides voice as
17 well as that data.

18 JUDGE LUIS: What's that word, is it
19 radioadaptive?

17 do understand that is a key issue in this case as
18 far as loop qualification information?
19 A Yes, I do.
20 Q I'd like to ask you a few questions on how that
21 process works to make sure you and I fully
22 understand each other. Now, as I understand it,
23 as updates are made to LFACS, those changes flow
24 into the loop qual database, the LQDB; is that
25 right?

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1 A Generally, yes, but it doesn't happen exactly the
2 way that you've stated.
3 Q Okay. Can you tell me, without unnecessary
4 detail, how that process works?
5 A Yes. Essentially the regular updates occur on a
6 rolling monthly basis. Every night some subset of
7 the wire centers are updated from LFACS into
8 LQDB. However, with each query into LQDB, another
9 query, so to speak, goes into LFACS from LQDB
10 looking for any recent change activity that's
11 occurred to LFACS, and that would be new connects,
12 that would be any other kind of service order
13 completion. If there has been any new activity or
14 changed activity, that information from LFACS then
15 gets populated into the loop qualification
16 database, and then becomes the basis for the
17 response for the qualification, depending on what
18 that transaction was.
19 Q Let's start with just the regular, I think was the
20 term you used, LFACS update. So every night say
21 10 wire centers are updated, or LFACS information
22 for 10 wire centers is updated and fed into the
23 loop qual database; right? And then every night
24 another set and another set, so in effect for all
25 of the loops you have the complete update on a

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1 30-day cycle, more or less?
2 A Pretty much.
3 Q Okay. So for a particular wire center, if it's
4 updated on day one of month one, the next time it
5 is refreshed, its LFACS information is refreshed
6 to be fed into the loop qual database, and that
7 will happen on day one of month two, or whatever
8 the regular cycle is for the update for that wire
9 center?
10 A For a full refresh, but for any changes that
11 occurred, they happen immediately.
12 Q And I understand that, but I want to make sure
13 that we are clear. So for these regular updates
14 to LFACS, the change in LFACS, which is then fed
15 into the loop qual database, as I understand the
16 process, is a Qwest technician determines that
17 there is a discrepancy between what he's facing in
18 the field and what LFACS reflects, and he fills
19 out some form or something that says, hey, LFACS,

20 you're wrong, here's actually the correct
21 information, sends it in and gets it updated; is
22 that correct?
23 A I wouldn't say that's the way that LFACS generally
24 gets updated. LFACS is -- I think that can happen
25 if a technician finds that there is a discrepancy,

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1 but in the general course of the work, LFACS is
2 updated through the service order process, because
3 as service orders are completed, new assignments
4 are made, then because it's not only an inventory
5 system, it's an assignment system, it has to be a
6 part of that whole provisioning process, and as a
7 result it gets updated for the majority of the
8 time that way.

9 Q I think we have two things going on. When a
10 service order triggers an LFACS change, that
11 service order, as I understand it, basically
12 changes the status of a loop in LFACS, whereas it
13 was available, it is now busy, because it's been
14 assigned to fill an order; is that what you're
15 talking about?

16 A That, or if there's anything within the loop that
17 has changed. Like, for example, if load coils
18 have been removed, that would happen with a
19 service order, it still is an assigned loop so the
20 status hasn't changed, however, the loop makeup
21 information has been modified.

22 Q Okay. So that would happen if a CLEC ordered a
23 loop, or Qwest, for example, and it turns out that
24 there were loads, then the service order reflects
25 there is loads on this loop?

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1 A Actually, Qwest does not request loads to be
2 removed when it issues service orders. The way
3 the Qwest process works is that if there are loads
4 on the line, the qualification comes back as red,
5 or no, and that's the end of that. The CLEC is
6 the only one that can request loads to be removed
7 based on its interaction in transactions that it
8 can submit.

9 Q So then it would -- the service order would prompt
10 an LFACS change when a CLEC order comes in, and it
11 requests that a loop be conditioned, that would
12 trigger a change in LFACS to say this loop that's
13 either assigned or will be assigned will no longer
14 have loads on it; is that right?

15 A It will appear in LFACS as the new state. I don't
16 believe it would necessarily say this is the
17 history, but it would then have a new state and
18 there would be the absence of load coils on that
19 particular loop makeup.

20 Q Other than where a service order is created that
21 requests conditioning, how does a service order
22 trigger a change in LFACS?

8 a monthly basis would be then input or overlaid
9 into the loop qualification database for those
10 particular wire centers as it goes through its
11 monthly refresh cycle.
12 Q Now, when we were talking about general LFACS
13 changes, we talked about service orders that would
14 prompt an LFACS change, as well as updates that
15 might come in via a technician. Are those the
16 same two methods by which recent changes would be
17 input into LFACS as well?
18 A Yes. I don't know if there are others, but those
19 would be the majority of the ways that anything
20 would update LFACS, would be by service order or
21 by someone putting in a correction.
22 Q Okay.
23 (Whereupon, Covad Exhibit 55
24 was marked for identification
25 by the court reporter.)

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1 BY MS. DOBERNECK:
2 Q Okay. Ms. Brohl, what's been marked as Exhibit 55
3 is Qwest's response to Covad information request
4 69. Let me know when you've had a moment to
5 review that.
6 A Okay. I've read it.
7 Q Okay. Now, I'd like to ask you a few questions
8 about the substance of that response. In the
9 second full sentence, where it talks about if
10 LFACS does not include complete cable network,
11 then the engineers manually research the makeup of
12 the facility; do you see that?
13 A I do.
14 Q Okay. Actually, one point before that, it says
15 Qwest engineers primarily utilize LFACS. Do those
16 engineers have direct access to LFACS?
17 A I believe that network, that there -- there is a
18 group of network technicians that do have direct
19 access to LFACS for provisioning purposes. I am
20 not sure whether this is the same group.
21 Q You stated they have access, is that direct access
22 or mediated access?
23 A My understanding is it's direct.
24 Q Now, turning to the second sentence about the
25 other records that these engineers might research,

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1 can you tell me what records are being referred
2 to?
3 A All I've been told in my dealings with this is
4 that they do go back to the engineering records,
5 and there are -- that there are engineering
6 records and planning records that can be
7 accessed. Now, I don't know titles of them, or if
8 they're in a mechanized database or anything like
9 that. But those would be the records that they
10 had used to primarily plan and engineer the

2 understand your summary, there's three -- there's
3 three primary reasons why Qwest believes a request
4 for preorder MLT is not necessary, and my
5 understanding is we have the MLT length, and an
6 MLT does not provide any information on the
7 existence of bridge tap or load coil. Is that a
8 fair summary or a fair understanding of at least
9 your portion of the Qwest position on preorder
10 access to MLT?

11 A In addition, while it can provide the presence of
12 pair gain, it doesn't tell you the type of pair
13 gain. Let me see if there's anything else. And
14 it's also -- it's limited. An MLT, an electronic
15 MLT test is limited to those loops that have
16 working telephone numbers that are connected to a
17 Qwest switch. So if it were for a new connected
18 service, there would be no way to do -- to run an
19 MLT against that, nor if it were a service that
20 were assigned, a telephone number that was
21 assigned to a CLEC there would be no way. So it
22 really limits also the subset of what you'd be
23 able to receive information on.

24 Q Let me ask you one clarifying question. When you
25 refer to pair gain, you are referring to something
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1 different than a load coil, just to be clear?

2 A Correct. Pair gain is the same as a digital loop
3 carrier.

4 Q Now, you also, I believe for the first time,
5 clarified on Qwest's behalf how it does run that
6 MLT that's used to populate the MLT distance in
7 the raw loop data tool, and as I understand it,
8 what you stated is that Qwest takes one loop, runs
9 an MLT on that particular loop, and then assumes
10 for all other loops, and I think you said in the
11 serving area, that the same MLT distance would
12 apply; is that correct?

13 A It takes one loop from the customer serving
14 terminal. And if you think about what the serving
15 terminal is, it's that little green thing in the
16 backyard, it's kind of like your neighborhood, so
17 it's going to be generally around the same length
18 or distance from the central office. You might
19 have a few blocks here and there, but generally
20 you can assume that the loop length for any one
21 loop in your neighborhood is going to be about the
22 same as any other. Approximately.

23 Q Okay. So that would then, we take say one, I
24 guess I refer to them as pedestals, but they're
25 the big green box that you see sort of along

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1 various blocks as you might drive around, and then
2 whatever area is served by that particular green
3 serving terminal, Qwest uses that for every other
4 loop within that serving area to that terminal?

5 A Within that serving terminal.
6 Q Okay. And can you tell me approximately how many
7 loops are served by any one serving terminal?
8 A I can't tell you that. I don't even know if
9 there's an average.
10 MR. STEESE: Ms. Doberneck, just so you
11 know, I know for a fact Mr. Pappas can answer that
12 question and you're free to ask that when he comes
13 back, irrespective of my redirect.

14 MS. DOBERNECK: Okay.

15 BY MS. DOBERNECK:

16 Q Now, Ms. Brohl, certainly Qwest has made clear
17 that when a Qwest retail employee queries the
18 Qwest DSL prequal loop and the red comes back,
19 that's the end of the matter, the order is
20 canceled; correct?

21 A Correct.

22 Q Now, when Qwest gets a green back and it goes out
23 to provision that customer, and I want to make
24 sure, I know we've talked about this before, but
25 if it goes out, it's a green, and they go out to

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1 provision and there's a problem, is that something
2 that I need to look to Mr. Pappas to in order to
3 determine what happens with that loop information
4 that needs to be changed?

5 A I don't know what happens to that in that
6 circumstance from a provisioning standpoint.

7 Q I'd like to go back to Qserv for a moment, if I
8 could, Ms. Brohl. Are there any circumstances
9 under which a Qwest retail employee would be able
10 to access that Qserv information to get at more of
11 the loop makeup information if they weren't
12 satisfied with the red response?

13 A Not that I know of. In addition, I don't think
14 they would know what to do with it.

15 MS. DOBERNECK: What exhibit number are
16 we on? 57.

17 (Whereupon, Covad Exhibit 57
18 was marked for identification
19 by the court reporter.)

20 BY MS. DOBERNECK:

21 Q Okay. Ms. Brohl, what's been marked as Exhibit 57
22 and has been placed in front of you is a
23 confidential Attachment AO to Qwest's response to
24 Covad information request 112. And I realize that
25 this document does not have any page numbers on

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1 it, but I would like you to flip to the, starting
2 with the very first page, flip to the fifth page.
3 And I'm looking at the bottom third of the page
4 with the sentence that starts with "check."

5 A Okay.

6 MS. DOBERNECK: Okay. I'm trying to
7 think of how to do it without going into the

2 A Yes.
3 Q Is this something that you have to run down the
4 street to a Qwest office to do or can you do it
5 right from your terminal?
6 A Right from your terminal, we have Internet access,
7 so all you need is a PC and Internet access and
8 you're ready to go.
9 Q And is that information you can get just on the
10 loop currently serving me that I have voice
11 service over or can you get the raw loop
12 information on those two extra loops?
13 A Yes, you can get it for the extra loops that serve
14 your home. At that time you need to issue an
15 unassigned by address query, which would then go
16 out and query for any or all spare loops to your
17 particular address, and the tool will return up to
18 24 spares to that particular location.
19 Q Now let's assume that you look at that loop, that
20 loop information, and you're not sure it's
21 accurate, you think there's something in there
22 that suggests the information is incomplete or
23 inaccurate, what would you do?
24 A Well, after I've looked at all -- both the
25 assigned and the unassigned, because I'd probably
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1 take a look at the unassigned as well, I would
2 then invoke the manual loop makeup process.
3 Q And how do you do that?
4 A If I go to Appendix D, again, there is a
5 particular e-mail address.
6 Q Before you start, you said Appendix D?
7 A Appendix D of the CLEC job aid.
8 Q Which is Exhibit 49 --
9 A BJB-Loopqual-2, page 105.
10 MS. DeCOOK: Your Honor, I'm going to
11 object to this answer because she indicated in
12 cross-examination to me that she can't confirm
13 that this is the actual process that the retail
14 side would use.
15 MR. STEESE: I'm talking about wholesale
16 questions, Ms. DeCook.
17 MS. DeCOOK: Oh, I'm sorry, I didn't
18 hear that. Never mind.
19 THE WITNESS: And in here it goes
20 through Appendix D of the CLEC job aid, which is
21 BJB-Loopqual-2, it lays out the procedure for
22 requesting the manual lookup, and essentially what
23 you do is you submit an e-mail to a particular
24 e-mail address, and you put in a certain amount of
25 information that's delineated here, and then you
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1 send the e-mail to this particular e-mail
2 address. At that point -- and that's what the
3 CLEC would do.
4 BY MR. STEESE:

5 Q And once that manual query was submitted via
6 e-mail to Qwest, what would Qwest do with that and
7 how quickly do we have to turn that around?
8 A Within 24 -- within 48 hours, excuse me, Qwest
9 will respond to the CLEC through e-mail and
10 provide the composition of the loop, location and
11 type of pair gain devices, terminals, electronic
12 devices, like bridge tap, load coils, that sort of
13 thing, the loop length, and then the wire gauge.
14 And after it submits the e-mail back to the CLEC,
15 it will then update both LFACS, which then will
16 feed into the loop qual database.
17 Q So I'm going to get back to that point in just a
18 minute in terms of updating. Digress for a
19 moment. Manual lookup, how long has that manual
20 lookup process been in existence, approximately?
21 A Since the early part of June.
22 Q So three plus months --
23 A Three months, um-hum.
24 Q -- or so? How many CLECs have availed themselves
25 of a request for a manual lookup to date?

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1 A I checked about a week or 10 days ago, and one
2 CLEC had done it, and requested it twice.
3 Q In Minnesota?
4 A No.
5 Q What state?
6 A Wyoming.
7 Q So despite the fact that this process has been
8 available on manual lookup, to date it has not
9 been used very much; correct?
10 A I would say so.
11 Q To what do you account for that?
12 MS. DOBERNECK: Your Honor, objection.
13 This goes far beyond the scope of any
14 cross-examination. I'm not exactly sure what it's
15 responding to at all.
16 MR. STEESE: I don't agree with that.
17 There were many questions by Ms. Doberneck going
18 to accuracy of the tool, whether or not
19 information is available to CLECs, and this goes
20 directly to both of those issues.
21 JUDGE LUIS: Yeah, it goes to the
22 performance issue, I guess, certainly.
23 Overruled. You may answer.
24 THE WITNESS: Would you reask the
25 question?

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1 BY MR. STEESE:
2 Q Sure. To what do you account for the fact that
3 there's been so few requests for manual lookup of
4 information?
5 A Well, if I go back to the reason that the manual
6 lookup would be requested, if the information
7 appears to the CLEC to be inconsistent or

Attachment 2

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

**Gregory Scott
Edward A. Garvey
Marshall Johnson
LeRoy Koppendrayner
Phyllis Reha**

**Chair
Commissioner
Commissioner
Commissioner
Commissioner**

**In the Matter of a Commission)
Investigation into Qwest's)
Compliance with Section 271(c)(2)(B))
of the Telecommunications Act of)
1996; Checklist Items 1, 2, 4, 5, 6, 11,)
13, and 14)**

**PUC Docket No. P- 421/CI-01-1371
OAH Docket No. 7-2500-14486-2**

QWEST CORPORATION

SUMMARY OF SURREPLY OF BARBARA BROHL

CHECKLIST ITEM 4 – PRE-ORDER LOOP QUALIFICATION

SEPTEMBER 9, 2002

1 **I. INTRODUCTION**

2 Qwest provides a variety of loop qualification tools to enable CLECs to
3 determine whether a loop is capable of providing DSL services. The principal Qwest
4 tools are the IMA Raw Loop Data Tool, the Wire Center Raw Loop Data Tool, and the
5 IMA Loop Qualification Tool.

6 **1. The IMA Raw Loop Data Tool.** This tool provides detailed underlying
7 loop make up information from Qwest's back office engineering systems,
8 including the LFACS database. The Wire Center Raw Loop Data Tool is
9 a web-based application that provides the same data as the IMA Raw
10 Loop Data Tool but for an entire wire center. The Raw Loop Data Tool
11 provides the following loop make up details: (i) telephone number, (ii)
12 address, (iii) Common Language Location Identification (CLLI), (iv) MLT
13 distance, (v) terminal ID, (vi) cable name, (vii) pair gain type, (viii) pair
14 number, (ix) load coil type, (x) number of load coils per segment, (xi)
15 bridged tap offset by segment, and (xii) cable gauge and length by
16 segment.

17 **2. The IMA 9.0 Loop Qualification Tool.** This recently enhanced tool is based
18 upon industry guidelines from the Local Services Ordering Group, version 5,
19 on format and content of loop qualification information and returns this
20 information for both Qwest DSL for Resale and Unbundled ADSL queries.
21 There are two tabs that present information.

- 1 a. Loop Status Tab: Provides the Loop Status (if the facilities are
2 qualified or not, whether a construction job is required, whether a bona
3 fide request is required, whether conditioning is required, and whether
4 the loop is not qualified due to length,), Loop Qualification Message
5 (whether the facilities qualify or not and why not), and a Loop Product
6 Availability Code.
- 7 b. Loop Data Tab: Provides information on the underlying characteristics
8 of the loop. Data points returned include: Local Service Termination,
9 Pair Gain/Digital Loop Carrier Presence, Equivalent Loop Length,
10 Remote Switching Unit Indicator, Loop Length Type, Loop Length,
11 Loop Length Gauge, Load Coil Quantity, Load Coil Type, Bridge Tap
12 Quantity, F1 Loop Composition, and F2 Loop Composition.

13 Exhibit BJB-LOOPQUAL-9 shows the data elements the loop qualification tools
14 return.

15 **II. Wilson Surrebuttal Regarding QServ and Access to LFACS.**

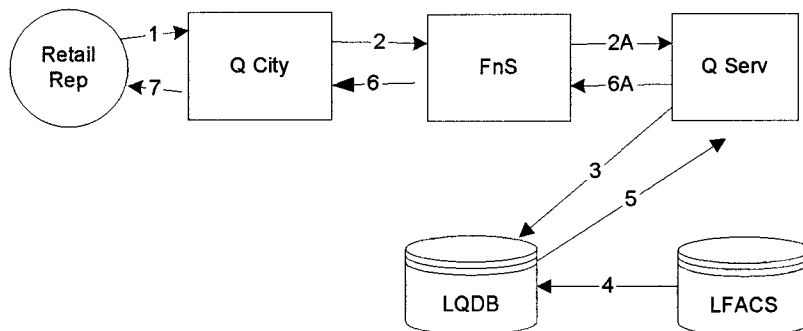
16 Mr. Wilson claims for the first time in his surrebuttal that KPMG work papers
17 from the Third Party OSS test state that Qwest retail representatives access the LFACS
18 database through QServ.

19 Mr. Wilson is wrong. Qwest retail representatives do not have access to the
20 LFACS database through QServ or QCity. To determine whether a loop qualifies for
21 Qwest DSL, Qwest retail representatives access the Loop Qualification Database

1 through QCity/QServ; they do not access LFACS. The Loop Qualification Database is
2 fed by LFACS and is equally available to both Wholesale and Retail. Unlike the tools
3 available to CLECs, the Qwest DSL Tool does not return underlying loop make up
4 information. It returns a red or green response, and a short message that indicates if
5 the line does or does not qualify for Qwest DSL.

6 Mr. Wilson misconstrues KPMG's work papers. The work paper that Mr. Wilson
7 appears to rely upon was based upon KPMG's initial interviews with Qwest regarding
8 loop qualification. During these initial interviews, KPMG did not completely or
9 accurately understand Qwest's loop qualification tools. Subsequently, in November
10 2001, KPMG conducted additional detailed interviews, met with Qwest retail and
11 wholesale personnel, and witnessed demonstrations of the various loop qualification
12 tools. I personally met with KPMG during this second round of evaluation. As a result
13 of this additional investigation and analysis, KPMG changed its prior findings, including
14 its notes regarding the loop qualification information available to Qwest retail
15 representatives. This revised analysis is described in KPMG's work papers and in Test
16 12.7 in the Third Party OSS Report. The Report includes a diagram, which is
17 reproduced in this written summary, which plainly shows that QServ and QCity do not
18 access the LFACS database.

Figure 12.7-1: Qwest Retail Loop Qualification Query Process



1. Representative accesses QCity Loop Qualification by telephone number (TN); Representative enters TN.
2. QCity sends telephone number to QServ.
- 2A. Data is transferred from QCity to QServ via Fetch 'n Stuff (FnS).
- QServ pulls Raw Loop Data (RLD) to make loop qualification determination from Loop Qualification Data Base (LQDB).
3. LQDB checks Loop Facilities Assignment & Control System (LFACS) to verify that data is current.
4. LQDB returns RLD for TN(s).
5. QServ uses RLD to determine loop qualification, and sends loop qualification results to QCity.
- 6A. Data is transferred from QServ to QCity via FnS.
6. QCity sends loop qualification results to representative.

The ROC OSS Final Report also includes the following process description:

Process Description: The QCity interface submits the query information to QServ. QServ is a middleware application that collects raw loop data from the LQDB, and uses an algorithm to determine whether or not the loop qualifies, based on the technical specifications for Qwest DSL service.

1 **III. Cutcher Surrebuttal Regarding The Raw Loop Data Tool.**

2 Ms. Cutcher's surrebuttal includes a new analysis of the alleged inaccuracies in
3 the Raw Loop Data Tool based upon recently produced Covad documents. Ms.
4 Cutcher's analysis shows nothing regarding the accuracy or alleged inaccuracies in the
5 tools. First, Ms. Cutcher does not provide any support for her allegations. For
6 example, she does not attach any screen prints from the Raw Loop Data Tool, and
7 Covad did not produce any screen prints from the tool in its discovery responses to
8 back up its allegations. More troubling, Covad's analysis was conducted *after* it
9 submitted its orders and, presumably, after the loops at issue had been conditioned (per
10 Covad's instructions). As a result, the Raw Loop Data Tool output now is entirely
11 different than what it would have been before Covad submitted its orders and before
12 Qwest conditioned the loops at issue. Covad's after-the-fact analysis, in other words,
13 shows nothing because the databases have been updated to reflect the conditioning of
14 the loops.

15 Because Covad did not attach any screen prints to support its allegations, there
16 is no way for Qwest to investigate whether the tool at the time Covad submitted its
17 orders contained any inaccuracies. Nevertheless, Qwest has investigated all of the
18 orders Covad claimed supported its allegations. Qwest pulled screen prints for every
19 loop, and every loop now shows the absence of load coils. Although a few loops shows
20 a limited length of bridged tap, none of that bridged tap is sufficient to affect the
21 provisioning of data service or would require conditioning of the loops. What Qwest's

1 analysis shows, therefore, is that Qwest does indeed update its LFACS database, and
2 hence its Raw Loop Data Tool, to keep the information in the tool current.

3 Ms. Cutcher also raises for the first time an allegation that in loading loop length
4 information from mechanized loop tests ("MLTs") into the Loop Qualification Database,
5 Qwest retained -- in her words, "hoarded" -- additional MLT information for its own use.

6 Ms. Cutcher appears to base this speculation on her interpretation of an *ex parte*
7 submission to the FCC Qwest made in connection with its first application for 271 relief
8 that explains the process Qwest used for loading MLT distance information into the
9 Loop Qualification Database. Ms. Cutcher mischaracterizes that *ex parte* and the MLT
10 process Qwest used. Qwest extracted only a limited subset of data from MLTs to load
11 the Loop Qualification Database: the telephone number, Date/Time, Verification Code
12 (which indicates if the test was successful or not), and the Loop Length. It did not
13 obtain or retain other loop-related information. The loop length information was loaded
14 into the Loop Qualification Database and is equally available to CLECs and Qwest.

15 Ms. Cutcher refers to a portion of the *ex parte* in which Qwest stated that some invalid
16 MLT information was referred to Qwest's engineers for manual handling. Again, Ms.
17 Cutcher mischaracterizes the process Qwest used. The only data that was referred to
18 the dedicated engineering team were for those loops for which Qwest could not obtain
19 a valid MLT result. No additional MLT data from this process was referred to the
20 engineers.

21 Contrary to the surrebuttal of Ms. Minda Cutcher, the Raw Loop Data Tool
22 provides the most current loop make up information available. In IMA Release 8.0,

1 implemented in August 2001, Qwest updated the IMA Raw Loop Data Tool to include a
2 "recent changes" feature. As a result of this enhancement, when a CLEC submits a
3 query to the Raw Loop Data Tool, the Raw Loop Data Tool queries the LFACS
4 database for any updated loop make up information for the telephone number queried.
5 If there is any updated information since the last synchronization of LFACS and LQDB,
6 the Raw Loop Data Tool returns the updated LFACS information.

7 Covad still persists in claiming that the Raw Loop Data Tool does not return
8 current loop make up information. I believe this is a result of Covad's own practices.
9 On August 20, 2002, I met with representatives of Covad as part of a Qwest-Covad
10 Operational Meeting. During that meeting, two Covad employees told me that Covad
11 principally uses the web-based Wire Center Raw Loop Data Tool to pre-qualify loops,
12 not the IMA tool with the "recent changes" feature. Furthermore, Covad only
13 downloads the Wire Center Raw Loop Data Tool every four weeks. Because of this
14 practice, Covad is depriving itself of the most current information in the Raw Loop Data
15 Tool.

Attachment 3

Pre-Order Process Requirements	Qwest	Verizon	SBC	BellSouth
Customer Service Record retrieval using telephone number (TN) (or circuit number if there is no TN)	CLEC must provide TN or circuit number and provide address and customer name. The CR to remove the name and address requirement is not scheduled for implementation until April 2003.	TN or circuit number is sufficient to retrieve the correct CSR.	TN or circuit number is sufficient to retrieve the correct CSR.	TN or circuit number is sufficient to retrieve the correct CSR.
USOCs within the CSR (S&E Section) are integrated into the LSR	S&E Section is not provided in TN hierarchy, which conflicts with TN hierarchy in LSR requirements	TN hierarchy in CSR is the same as in the LSR.	TN hierarchy in CSR is the same as in the LSR.	TN hierarchy in CSR is the same as in the LSR.

Order Process Requirements	Qwest	Verizon	SBC	BellSouth
TN migration supported for UNE-P	Not scheduled for implementation until April 2003.	TN migration capability is provided to CLECs.	TN migration capability is provided to CLECs.	TN migration capability is provided to CLECs.
UNE-P orders require only the Class of Service (C/Svc) USOC for UNE-P	Qwest's ordering process requires entry of the existing retail C/Svc. as well as the C/Svc. for UNE-P. The CR to remove this additional requirement is not scheduled for implementation until April 2003.	CLECs need to specify only the C/Svc for UNE-P.	CLECs need to specify only the C/Svc for UNE-P.	CLECs need to specify only the C/Svc for UNE-P.
Identify the USOCs that the end-user requires on UNE-P migrations with a single activity code.	Qwest's ordering process requires CLEC orders to differentiate (using different activity codes) between features that the customer currently takes from Qwest and is retaining, and new features that the customer is taking. The CR to remove this additional requirement is not scheduled for implementation until April 2003.	Only one activity code (to reflect "as specified" USOCs) is required.	Only one activity code (to reflect "as specified" USOCs) is required.	Only one activity code (to reflect "as specified" USOCs) is required.

Attachment 4

EXCEPTION 3028 – DISPOSITION REPORT

Qwest OSS Evaluation

Initial Release Date: August 28, 2001
First Response Date: September 28, 2001
Second Response Date: October 10, 2001
Third Response Date: November 26, 2001
Fourth Response Date: December 17, 2001
Fifth Supplemental Response Date: December 20, 2001
Sixth Response Date: January 16, 2002
Disposition Report Date: February 5, 2002

EXCEPTION DISPOSITION REPORT

An exception has been identified as a result of the test activities associated with Provisioning Test 14.

Exception:

Qwest's systems or representatives have not consistently provisioned services and features as specified in orders submitted by the Pseudo-CLEC.

Summary of Exception:

KPMG Consulting conducted a Customer Service Record (CSR) validation test to ensure that the information contained in the CSR is correctly updated and consistent with the Local Service Request (LSR). The CSR is a record of customer information that is maintained in Qwest's legacy systems, and can be used to verify listing, billing and services related information.

KPMG Consulting found that the information contained in Post-LSR activity CSRs was not consistent with the requirements of the LSRs (submitted by the Pseudo-CLEC) or with the information in the Pre-LSR activity CSR, for items where the LSR did not specify updates.

Summary of Qwest's Initial and Supplementary Responses:

Qwest provided coaching to personnel on the procedures to follow to ensure accurate updates to CSRs, issued several MCCs to the work centers, and corrected version 6.0 system errors in the version 7.1 release to address the issues identified in the exception. Qwest updated the Billing - Customer Records and Information System website on 10/22/01 to include the billing posting timeframes and provided documentation of all mandatory features for specific accounts.

KPMG Consulting's Disposition Report (02/05/02):

Summary of KPMG Consulting's Retest Activities

During the first retest, KPMG Consulting examined 51 additional CSRs and found that 46 (90%) of the CSRs were accurately updated, which is below the 95% benchmark that KPMG Consulting applies for provisioning accuracy. After Qwest addressed the additional issues identified during the first retest, a second retest was conducted and consisted of a review of 106 CSRs from 1/16/02 through 1/24/02.

EXCEPTION 3028 – DISPOSITION REPORT

Qwest OSS Evaluation

The issue of the timing of updates was raised in association with the initial CSR testing. The following is posted on the Customer Records and Information System website:

- CRIS will update a CSR within three to five business days. Exception would be if the service order errors. Errors are manually worked and once the error has been fixed, then the service order will take the three to five business days to post

KPMG Consulting reviewed the CSRs assessed for accuracy and for timeliness (updates within 5 business days). The results are reported below.

Summary of KPMG Consulting's Retest Results:

During the second retest, KPMG Consulting examined 106 CSRs and found that 103 (97%) were updated correctly. This result for the provisioning of services and features is within the 95% standard that KPMG Consulting applies for CSR accuracy.

KPMG Consulting examined the 106 CSRs for timeliness and found that 101 (95.2%) were updated within 5 days business. This result is within the 95% standard that KPMG Consulting applies for CSR updates.

KPMG Consulting recommends that Exception 3028 be closed.

Attachment 5

EXCEPTION 3043 – DISPOSITION REPORT

Qwest OSS Evaluation

Initial Release Date: September 12, 2001
First Response Date: October 18, 2001
Second Response Date: November 12, 2001
Third Response Date: December 7, 2001
Fourth Response Date: December 13, 2001
Disposition Report Date: February 5, 2002

EXCEPTION DISPOSITION REPORT

KPMG Consulting has identified an exception as a result of the testing activities associated with Provisioning Verification and Validation, MTP Test 14.

Exception:

Qwest failed to use the proper codes when provisioning switch translations, as specified in orders submitted by the P-CLEC.

Summary of Exception:

KPMG Consulting conducted a Switch Translation Validation test to verify the provisioning of services and features. To conduct the test, KPMG Consulting requested the switch translation reports for a random sample of telephone numbers and verified the translation accuracy using the switch translation codes provided by Qwest. KPMG Consulting initially found that 70 out of 79 (89%) switch translation reports included all the service and feature codes as requested by the Local Service Request (LSR) submitted by the P-CLEC.

Summary of Qwest's Initial and Supplementary Responses:

Qwest initially provided coaching to personnel emphasizing service order completion and information validation. Following KPMG Consulting's first retest, Qwest provided additional coaching to individuals and retrained all RCMAC personnel to stress the need to follow procedures and review LSRs for possible rejection reasons.

KPMG Consulting's Disposition Report (02/05/02): Summary of KPMG Consulting's Retest Activities

KPMG Consulting retested 102 additional test instances and found that Qwest accurately provisioned 93 (91%) of this test sample. Following additional coaching and training by Qwest, a second retest was conducted starting in January 2002.

Summary of KPMG Consulting's Retest Results:

During the second retest, KPMG Consulting examined 106 Switch Translations and found that 105 (99%) were provisioned correctly, which is within the 95% standard that KPMG Consulting applies for accuracy of provisioning of services and features.

EXCEPTION 3043 – DISPOSITION REPORT

Qwest OSS Evaluation

KPMG Consulting recommends that Exception 3043 be closed.

Attachment 6

**Local Switching and Unbundled Network Elements Combinations (UNE Combinations)
Amendment Number 3
to the Interconnection Agreement between
Qwest Corporation and
TCG-Phoenix
for the State of Arizona**

This is an Amendment ("Amendment") for Local Switching and Unbundled Network Elements Combinations (UNE Combinations) to the Interconnection Agreement between Qwest Corporation ("Qwest"), a Colorado corporation, and TCG-Phoenix ("CLEC"). CLEC and Qwest shall be known jointly as the "Parties".

RECITALS

WHEREAS, CLEC and Qwest entered into an Interconnection Agreement ("Agreement") for service in the state of Arizona which was approved by the Arizona Corporation Commission ("Commission"); and

WHEREAS, the Parties wish to amend the Agreement further under the terms and conditions contained herein.

AGREEMENT

NOW THEREFORE, in consideration of the mutual terms, covenants and conditions contained in this Amendment and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties agree as follows:

A. Amendment Terms

The Agreement is hereby amended by adding terms, conditions and rates for Local Switching and Unbundled Network Elements Combinations (UNE Combinations) as set forth in Attachments 1 and 2 and Exhibits A, B, C and D to this Amendment, attached hereto and incorporated herein by this reference.

1. Qwest shall provide non-discriminatory access to unbundled network elements on rates, terms and conditions that are non-discriminatory, just and reasonable. The quality of an unbundled network element Qwest provides, as well as the access provided to that element, will be equal between all carriers requesting access to that element; second, where technically feasible, the access and unbundled network element provided by Qwest will be provided in "substantially the same time and manner" to that which Qwest provides to itself or to its affiliates. In those situations where Qwest does not provide access to network elements to itself, Qwest will provide access in a manner that provides CLEC with a meaningful opportunity to compete. For the period of time Qwest provides access to CLEC to an unbundled network element, CLEC shall have exclusive use of the network element, except when the provisions herein indicate that a network element will be shared (such as shared transport). Notwithstanding specific language in other sections of this Agreement, all provisions of this Agreement regarding unbundled network elements are subject to this requirement. In addition, Qwest shall comply with all state wholesale service quality requirements.

ATTACHMENT 2

Unbundled Network Elements Combinations (UNE Combinations)

1. General Terms

1.1 Qwest shall provide CLEC with non-discriminatory access to combinations of Unbundled Network Elements including but not limited to the UNE-Platform (UNE-P) and Enhanced Extended Loop (EEL), according to the following terms and conditions.

1.2 Qwest will offer to CLEC UNE Combinations, on rates, terms and conditions that are just, reasonable and non-discriminatory in accordance with the terms and conditions of this Amendment and the requirements of Section 251 and Section 252 of the Act, the applicable FCC rules, and other applicable laws. The methods of access to UNE Combinations described in this Section are not exclusive. Qwest will make available any other form of access requested by CLEC that is consistent with the Act and the regulations thereunder. CLEC shall be entitled to access to all combinations functionality as provided in FCC rules and other applicable laws. Qwest shall not require CLEC to access any UNE combinations in conjunction with any other service or element unless specified in this Amendment or as required for technical feasibility reasons. Qwest shall not place any use restrictions or other limiting conditions on UNE combination(s) accessed by CLEC except as specified in this Amendment or required by applicable law.

1.2.1 Changes in law, regulations or other applicable law relating to UNEs and UNE Combinations, including additions and deletions of elements Qwest is required to unbundle and/or provide in a UNE Combination, shall be incorporated into this Amendment. CLEC and Qwest agree that the UNEs identified in the Agreement, as amended, are not exclusive and that pursuant to changes in FCC rules, state laws, or the Bona Fide Request process, CLEC may identify and request that Qwest furnish additional or revised UNEs to the extent required under Section 251(c)(3) of the Act and other applicable laws. Failure to list a UNE herein shall not constitute a waiver by CLEC to obtain a UNE subsequently defined by the FCC or the state Commission

1.2.2 In addition to the UNE combinations provided by Qwest to CLEC hereunder, Qwest shall permit CLEC to combine any UNE provided by Qwest with another UNE provided by Qwest or with compatible network components provided by CLEC or provided by third parties to CLEC in order to provide Telecommunications Services. UNE Combinations will not be directly connected to a Qwest Finished Service, whether found in a Tariff or otherwise, without going through a Collocation, unless otherwise agreed to by the Parties. Notwithstanding the foregoing, CLEC can connect its UNE Combination to Qwest's Directory Assistance and Operator Services platforms.

1.3 When ordered as combinations of UNEs, network elements that are currently combined and ordered together will not be physically disconnected or separated in any fashion except for technical reasons or if requested by CLEC. Network elements to be provisioned together shall be identified and ordered by CLEC as such. When CLEC

day. For UNE-P-DSS, UNE-P-ISDN-PRI, UNE-P-PBX, EEL, and all other UNE combinations, the date the LSR or ASR is received is considered the start of the service interval if the order is received on a business day prior to 3:00 p.m. For UNE-P-DSS, UNE-P-ISDN-PRI, UNE-P-PBX, EEL, and all other UNE combinations, the service interval will begin on the next business day for service requests received on a non-business day or after 3:00 p.m. on a business day. For purposes of this Attachment 2, Business days exclude Saturdays, Sundays, New Year's Day, Memorial Day, Independence Day (4th of July), Labor Day, Thanksgiving Day and Christmas Day.

5.5 The Parties' obligations and responsibilities for providing and maintaining end user customer listings information are contained in the Listings and E911/911 Emergency Services sections of the Agreement. Nevertheless, to the extent that the option is available to CLEC to specify that the end user customer's existing listing(s) be retained upon conversion to Unbundled Local Switching elements or UNE-P Combinations, Qwest shall be responsible for ensuring that the end user customer's listing(s) is retained "as is" in Qwest's listings data bases.

5.6 When Qwest's end user customer or the end user customer's new service provider orders the discontinuance of the end user customer's existing service in anticipation of moving to another service provider, Qwest will render its closing bill to the end user customer effective with the disconnection. If Qwest is not the local service provider, Qwest will issue a bill to CLEC for that portion of the service provided to CLEC should CLEC's end user customer, a new service provider, or CLEC request service be discontinued to the end user customer. Qwest will notify CLEC by FAX, OSS interface, or other agreed upon processes when an end user customer moves to another service provider. Qwest shall not provide CLEC or Qwest retail personnel with the name of the other service provider selected by the end user customer.

5.7 For UNE Combinations, CLEC shall provide Qwest and Qwest shall provide CLEC with points of contact for order entry, problem resolution, repair, and in the event special attention is required on service request.

6. Billing

6.1 Qwest shall provide CLEC, on a monthly basis, within seven to ten (7-10) calendar days of the last day of the most recent billing period, in an agreed upon standard electronic billing format, billing information including (1) a summary bill, and (2) individual end user customer sub-account information consistent with the samples available for CLEC review.

7. Maintenance and Repair

7.1 Qwest will maintain facilities and equipment that comprise the service provided to CLEC as a UNE Combination. CLEC or its end user customers may not rearrange, move, disconnect or attempt to repair Qwest facilities or equipment, other than by connection or disconnection to any interface between Qwest and the end user customer, without the written consent of Qwest.

**Local Switching and Unbundled Network Elements Combinations (UNE Combinations)
Amendment Number 3
to the Interconnection Agreement between
Qwest Corporation and
TCG-Denver
for the State of Colorado**

This is an Amendment ("Amendment") for Local Switching and Unbundled Network Elements Combinations (UNE Combinations) to the Interconnection Agreement between Qwest Corporation ("Qwest"), a Colorado corporation, and TCG-Denver ("CLEC"). CLEC and Qwest shall be known jointly as the "Parties".

RECITALS

WHEREAS, CLEC and Qwest entered into an Interconnection Agreement ("Agreement") for service in the state of Colorado which was approved by the Colorado Public Utilities Commission ("Commission"); and

WHEREAS, the Parties wish to amend the Agreement further under the terms and conditions contained herein.

AGREEMENT

NOW THEREFORE, in consideration of the mutual terms, covenants and conditions contained in this Amendment and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties agree as follows:

A. Amendment Terms

The Agreement is hereby amended by adding terms, conditions and rates for Local Switching and Unbundled Network Elements Combinations (UNE Combinations) as set forth in Attachments 1 and 2 and Exhibits A, B, C and D to this Amendment, attached hereto and incorporated herein by this reference.

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1.2 Qwest will offer to CLEC UNE Combinations, on rates, terms and conditions that are just, reasonable and non-discriminatory in accordance with the terms and conditions of this Amendment and the requirements of Section 251 and Section 252 of the Act, the applicable FCC rules, and other applicable laws. The methods of access to UNE Combinations described in this Section are not exclusive. Qwest will make available any other form of access requested by CLEC that is consistent with the Act and the regulations thereunder. CLEC shall be entitled to access to all combinations functionality as provided in FCC rules and other applicable laws. Qwest shall not require CLEC to access any UNE combinations in conjunction with any other service or element unless specified in this Amendment or as required for technical feasibility reasons. Qwest shall not place any use restrictions or other limiting conditions on UNE combination(s) accessed by CLEC except as specified in this Amendment or required by applicable law.

1.2.1 Changes in law, regulations or other applicable law relating to UNEs and UNE Combinations, including additions and deletions of elements Qwest is required to unbundle and/or provide in a UNE Combination, shall be incorporated into this Amendment. CLEC and Qwest agree that the UNEs identified in the Agreement, as amended, are not exclusive and that pursuant to changes in FCC rules, state laws, or the Bona Fide Request process, CLEC may identify and request that Qwest furnish additional or revised UNEs to the extent required under Section 251(c)(3) of the Act and other applicable laws. Failure to list a UNE herein shall not constitute a waiver by CLEC to obtain a UNE subsequently defined by the FCC or the state Commission

1.2.2 In addition to the UNE combinations provided by Qwest to CLEC hereunder, Qwest shall permit CLEC to combine any UNE provided by Qwest with another UNE provided by Qwest or with compatible network components provided by CLEC or provided by third parties to CLEC in order to provide Telecommunications Services. UNE Combinations will not be directly connected to a Qwest Finished Service, whether found in a Tariff or otherwise, without going through a Collocation, unless otherwise agreed to by the Parties. Notwithstanding the foregoing, CLEC can connect its UNE Combination to Qwest's Directory Assistance and Operator Services platforms.

1.3 When ordered as combinations of UNEs, network elements that are currently combined and ordered together will not be physically disconnected or separated in any fashion except for technical reasons or if requested by CLEC. Network elements to be provisioned together shall be identified and ordered by CLEC as such. When CLEC

interval will begin on the next business day for service requests received on a non-business day or after 3:00 p.m. on a business day. For purposes of this Attachment 2, Business days exclude Saturdays, Sundays, New Year's Day, Memorial Day, Independence Day (4th of July), Labor Day, Thanksgiving Day and Christmas Day.

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7.1 Qwest will maintain facilities and equipment that comprise the service provided to CLEC as a UNE Combination. CLEC or its end user customers may not rearrange, move, disconnect or attempt to repair Qwest facilities or equipment, other than by connection or disconnection to any interface between Qwest and the end user customer, without the written consent of Qwest.

**Local Switching and Unbundled Network Elements Combinations (UNE Combinations)
Amendment Number 3
to the Interconnection Agreement between
Qwest Corporation and
TCG-Seattle
for the State of Washington**

This is an Amendment ("Amendment") for Local Switching and Unbundled Network Elements Combinations (UNE Combinations) to the Interconnection Agreement between Qwest Corporation ("Qwest"), a Colorado corporation, and TCG-Seattle ("CLEC"). CLEC and Qwest shall be known jointly as the "Parties".

RECITALS

WHEREAS, CLEC and Qwest entered into an Interconnection Agreement ("Agreement") for service in the state of Washington which was approved by the Washington Utilities and Transportation Commission ("Commission"); and

WHEREAS, the Parties wish to amend the Agreement further under the terms and conditions contained herein.

AGREEMENT

NOW THEREFORE, in consideration of the mutual terms, covenants and conditions contained in this Amendment and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties agree as follows:

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ATTACHMENT 1**Local Switching**

Qwest shall provide access to Unbundled Local Switching in a non-discriminatory manner according to the following terms and conditions.

1. Description

1.1 Access to Unbundled Local Switching encompasses line-side and trunk-side facilities, plus the features, functions, and capabilities of the switch. The features, functions, and capabilities of the switch include the basic switching function, as well as the same basic capabilities that are available to Qwest's end user customers. Unbundled Local Switching also includes access to all vertical features that the switch is capable of providing, as well as any technically-feasible customized routing functions. Moreover, CLEC may purchase Unbundled Local Switching in a manner that permits CLEC to offer exchange access and termination of extended area service/local traffic.

1.1.1 CLEC is not required to use Qwest's directory assistance services or operator services with its Unbundled Local Switching elements or UNE-P Combinations. CLEC may arrange to provide access to its own, or to a third party's, directory assistance or operator services platform with its unbundled switching elements and UNE-P Combinations.

1.1.2 Qwest offers access to GR-303 features and functionalities as outlined in this Section. As a condition of this virtual access, CLEC must deploy a Remote Digital Terminal (RT) "hosted" by a GR-303 capable Qwest switch. Under this architecture, and dependent on the existence and availability of GR-303 in any given office, a CLEC may deploy any compatible GR-303 remote terminal under the following conditions:

1.1.2.1 The Qwest central office must have existing GR-303 capability with spare capacity available for use by CLEC. In addition, while CLEC may deploy its choice of Remote Terminal, it must be compatible with the existing Qwest GR-303 interface.

1.1.2.2 The transport between the Qwest switch and the CLEC RT may be purchased from Qwest or provided by CLEC. If transport is provided by Qwest, the demarcation point will be at a physical cross connect point at the RT. If transport is provided by CLEC, the demarcation point will be at a physical cross connect in the Qwest central office.

1.1.2.3 Concentration levels will be in keeping with Qwest's current standard of 4:1 at the switch. The specific concentration ratios to be applied to the RTs will be determined on a case by case basis.

1.1.2.4 The TR-057 interface at the RT will be disabled. This interface enables the universal DLC applications and offers access to the

day. For UNE-P-DSS, UNE-P-ISDN-PRI, UNE-P-PBX, EEL, and all other UNE combinations, the date the LSR or ASR is received is considered the start of the service interval if the order is received on a business day prior to 3:00 p.m. For UNE-P-DSS, UNE-P-ISDN-PRI, UNE-P-PBX, EEL, and all other UNE combinations, the service interval will begin on the next business day for service requests received on a non-business day or after 3:00 p.m. on a business day. For purposes of this Attachment 2, Business days exclude Saturdays, Sundays, New Year's Day, Memorial Day, Independence Day (4th of July), Labor Day, Thanksgiving Day and Christmas Day.

5.5 The Parties' obligations and responsibilities for providing and maintaining end user customer listings information are contained in the Listings and E911/911 Emergency Services sections of the Agreement. Nevertheless, to the extent that the option is available to CLEC to specify that the end user customer's existing listing(s) be retained upon conversion to Unbundled Local Switching elements or UNE-P Combinations, Qwest shall be responsible for ensuring that the end user customer's listing(s) is retained "as is" in Qwest's listings data bases.

5.6 When Qwest's end user customer or the end user customer's new service provider orders the discontinuance of the end user customer's existing service in anticipation of moving to another service provider, Qwest will render its closing bill to the end user customer effective with the disconnection. If Qwest is not the local service provider, Qwest will issue a bill to CLEC for that portion of the service provided to CLEC should CLEC's end user customer, a new service provider, or CLEC request service be discontinued to the end user customer. Qwest will notify CLEC by FAX, OSS interface, or other agreed upon processes when an end user customer moves to another service provider. Qwest shall not provide CLEC or Qwest retail personnel with the name of the other service provider selected by the end user customer.

5.7 For UNE Combinations, CLEC shall provide Qwest and Qwest shall provide CLEC with points of contact for order entry, problem resolution, repair, and in the event special attention is required on service request.

6. Billing

6.1 Qwest shall provide CLEC, on a monthly basis, within seven to ten (7-10) calendar days of the last day of the most recent billing period, in an agreed upon standard electronic billing format, billing information including (1) a summary bill, and (2) individual end user customer sub-account information consistent with the samples available for CLEC review.

7. Maintenance and Repair

7.1 Qwest will maintain facilities and equipment that comprise the service provided to CLEC as a UNE Combination. CLEC or its end user customers may not rearrange, move, disconnect or attempt to repair Qwest facilities or equipment, other than by connection or disconnection to any interface between Qwest and the end user customer, without the written consent of Qwest.

Attachment 7

CR #	Release #	Title	Status	Level of Effort	Interfaces Impacted	Product Impacted
			Date			
SCR090601-1		Request that UNE-P orders to be billed on a CABS bill.	Canceled Qwest	Large	Wholesale Billing Interfaces	UNE-P
			9/21/01			

Submitter: Osborne-Miller, Donna AT&T

Director: To Be, Determined

Owner: Routh, Mark

CR PM: Routh, Mark

Description Of Change

Today all UNE-P orders are billed out of the CRIS billing system. AT&T can only receive CRIS bills via paper, which makes it extremely inefficient and difficult to use. In addition, the CRIS bill does not provide the level of detail required for auditing or for inventory, i.e. USOC, Circuit ID and CRS. The level of detail needed and electronic interface are available in the CABS billing system. Moreover, Qwest negotiated CABS billing in its interconnection agreements. Therefore AT&T requests that UNE-P orders be billed on a CABS bill. Qwest is in the process of CABS formatting CSRs, however, AT&T needs the entire bill in the CABS format and not just the CSR.

Status History

09/06/01 - CR was received

09/07/01 - CR was logged and status set to "Submitted". Sent Updated CR to Donna Osborne-Miller, Tim Bessey and Lydell Peterson

10/11/01 - Carla Dickenson updated the description for this CR.

Qwest Response

The CABS formatted CSR work which is being completed will provide the necessary detail required for auditing and inventory.

Attachment 8



Timothy Boykin
District Manager
1875 Lawrence Street
Suite 8-14
Denver, CO 80202
303-298-6447

August 7, 2002

Via and U.S Mail and E-mail

Scott Schipper
General Manager Wholesale Major Markets
Qwest Communications
200 South 5th Street, Rm 2400
Minneapolis, Minnesota 55402

RE: Problems Associated with CABS Billing

Dear Scott:

In response to AT&T's change request SCR090601-1, Qwest implemented CABS billing for AT&T's UNE-P bills. AT&T received its first CABS bill during the month of July 2002. However, there are a number of problems associated with this first bill, and as a result, AT&T is not able to process the mechanized CABS bill. We would like to request your assistance to remedy these problems.

Without going into great detail in this letter, the problems associated with this bill are two fold. First, the usage/incurred dates are invalid on the Adjustments and OC&C. The bills use a "from date" and "thru date" of 00010101 rather than actual usage dates. Secondly, the bills are out of balance. The supporting details do not sum to the total for several categories including taxes and usage. In addition, Qwest still forwards a paper bill – the CABS mechanized bill and the paper bill do not match.

Yvonne Hopkins, AT&T, has been working with Qwest representative Jamie Larson to resolve these issues, however, to date, there has been no resolution. AT&T has been patiently working with paper bills for some time. AT&T was excited to finally obtain a mechanized CABS bill and is very disappointed that the bill is incorrect.

Early next week, we would like to arrange a meeting with Qwest SMEs to discuss these problems and resolve all issues. Could you assist us in organizing your subject matter experts to close these issues? Qwest CMP managers are very anxious to close this CR, however, until these issues are resolved, AT&T is not able to close SCR090601-1.

Thank you for your assistance in this regard. I look forward to hearing from you.

Very truly yours,

Timothy Boykin
District Manager
AT&T Local Services and Access Management

Attachment

Cc: Pam Delaittre
Pete Budner
Tim Bessey

Attachment 9



Timothy Boykin
District Manager
1875 Lawrence Street
Suite 8-14
Denver, CO 80202
303-298-6447

September 23, 2002

Via U.S Mail and E-mail

Judy Taylor
Senior Director Wholesale Billing
Qwest Communications
900 Keosauqua Way, 1st Floor
Des Moines, Iowa 50309

RE: Problems Associated with CABS Billing Implementation for AT&T

Dear Ms. Taylor:

AT&T submitted a change request¹ in Qwest's Change Management Process "CMP") in September 2001 requesting that Qwest implement CABS billing for UNE-P billing purposes. In response to this change request Qwest implemented CABS billing for AT&T's UNE-P bills effective July 2002. AT&T has now received CABS bills during the months of July, August and September; however, AT&T continues to experience a number of problems associated with these bills. As a result, AT&T cannot process these bills and continues to rely on the CRIS paper bills for processing. The CABS bills continue to be transmitted with the total charges out of balance with the bill detail, the total charges out of balance with the CRIS paper bills and the total recurring charges out of balance with the CSR detail. AT&T is frustrated that after three months, the same problems continue to arise. In addition, the September bills for Colorado and Arizona were sent with incorrect Payment Due Dates of September 26 and September 29, respectively. And, while AT&T has not completed the review of the CABS-formatted Customer Service Records yet, the most recent publication of the Qwest Version 37 Differences List dated September 18, 2002, indicates that more issues may exist. These issues include absence of USOC information and Service Established Date, and the use of generic Phrase Codes.

On September 16, 2002, as a part of the CLEC forum, Qwest presented two breakout sessions on billing and billing options. During that session, I understand that Qwest representatives Carl Sear and Allan Zimmerman indicated that the CRIS paper

¹ Qwest assigned the number SCR090601-1 to AT&T's request.

bills continue to be the bill of record, and that Qwest considers the UNE-P CABS bill still under "development". I also understand that Jeff Thompson made a similar acknowledgment during the Systems CMP meeting on September 19, 2002.

AT&T representatives continue to work with Terry Cloke of the Des Moines Center and Jamie Larson of the IABS billing team, however, without resolution. I am also attaching a letter I sent to Scott Schipper outlining these same concerns in August. During the CLEC Forum Qwest announced a new Billing Dispute Resolution policy – indicating that the Billing SDC has 28 days from acknowledgement to resolve claims. We are hopeful that all issues relating to the CABS bill can be resolved before the next bill is sent and request that Qwest commit to a timeframe within which these issues will be resolved.

AT&T is interested in using UNE-P to serve customers in additional Qwest markets. However, Qwest's inability to solve the CABS problems with UNE-P billing has caused AT&T great concern about whether Qwest can provide accurate, reliable and auditable UNE-P bills as AT&T's UNE-P volumes increase. We are in hopes that Qwest can resolve these issues expeditiously.

Thank you for your assistance in this regard. I look forward to hearing from you.

Very truly yours,

Timothy Boykin
District Manager
AT&T Local Services and Access Management

Attachment

Cc: Scott Martin
Terry Cloke
Pam Delaittre
Pete Budner
Lydell Peterson
Greg Terry
Christy Dennis

Attachment

Attachment 10

Meeting Minutes

September Monthly Systems CMP Meeting

September 19, 2002 8 a.m. – 5 p.m.

Inverness Hotel – Conference Room D

Meeting Start Time: 8 a.m.

PURPOSE

CMP participants met to discuss and review the status of Action Items; CLEC and Qwest initiated Change Requests and other CMP items. Following is the write-up of the discussions, action items, and decisions made in the working session.

ATTACHMENTS

The list of Attachments is as follows:

Attachment A — List of Attendees

MEETING MINUTES

Mike Buck/Qwest—The meeting began with Qwest making introductions and welcoming all attendees.

Mike Buck/Qwest—pointed to attachment A (Meeting minutes from the August Systems CMP meeting) and noted that no updates were received prior to the September meeting. He noted that the minutes from the 10.1 post deployment call were also included in the attachment. He asked if there were any questions or comments on the meeting minutes that were included in the packet. There were no comments.

Mike Buck/Qwest – reviewed the announcements listed at the end of the agenda as well as the attachments included in the package:

- The October CMP Systems Meeting is October 17, 2002 in the normal downtown Denver location
- The next Sate meeting is Tuesday, September 24, 2002. The bridge information is in the package.
- Attachment J – Outstanding Systems CRs
- Attachment K – Outstanding Billing CRs with detail
- Attachment L – Deployed CRs (none planned before October meeting)
- Attachment M – Production Support Tickets (none for August)
- Attachment R – Driving Directions to Inverness

Kathy Stichter/Eschelon—wanted to review what items will be included in the next CEMR release. Michael Buck/Qwest said that Qwest would provide that information before the end of the meeting

Later in the meeting Dan Buseti/Qwest reported that the next CEMR Release that is scheduled in November. SCR030702-01 (Trouble Ticket Cross Reference) originated by Eschelon is scheduled for inclusion in the November release. Related work to support getting trouble ticket information on the bill is also scheduled.

Attachment N - CMP Redesign Update

Michael Buck/Qwest advised that the Redesign update was provided yesterday in the Product/Process Meeting and asked if anyone wanted a recap today. There were no requests for a recap.

Attachment O – Trouble/Billing “Synergy” CRs

Qwest Wholesale Change Management Process (CMP) Meeting Minutes

Michael Buck/Qwest noted that a readout of the "Synergy CRs was provided yesterday in the Product/Process Meeting and asked if anyone wanted a recap today.

Kathy Stichter/Eschelon said that Jeff Thompson/Qwest took an action item from the meeting yesterday on record orders.

Dan Buseti/Qwest said that we don't have an answer yet.

Jeff Thompson/Qwest said that the answer will be provided in advance of the October CMP meeting.

Attachment P – SCR082302-01EX / Attachment Q – SCR091002-01EXRG

Mike Buck/Qwest—noted that there was a request to have the votes for the 2 exception CRs done before 11:30.

There were no additional questions regarding the agenda or attachments.

SATE UPDATE

Wendy Green/Qwest—indicated that there is a user group meeting next Tuesday, and invited everyone to please join. She noted that the packet will be sent out today (9/19/02) and would include the agenda and the minutes from the previous meeting. She indicated that we are continuing to work on 11.0 SATE development, currently scheduled for Oct 18. She pointed out the 2 non-IMA items as the FBDL and EEL product additions. She noted that based on last month's prioritization, Qwest is working on the IMA 12.0 requirements which should include SATE candidates from the prioritized list as well as all of the IMA candidates. She asked if there were any questions.

Bonnie Johnson/Eschelon — do you know what will make it in to the 12.0 bucket?

Wendy Green/Qwest — no, we are still evaluating what will be in the release and have started the requirements for 12.0

Bonnie Johnson/Eschelon — ok, thank you.

NEW CRS INITIATED BY CLECS

SCR080702-01 (Update CEMR to use ZCID in addition to RSID) – Originated by Desktop Media

Mike Buck/Qwest — presented CR on behalf of Desktop Media who was not in attendance. The clarification call was held with Desktop Media and in the course of doing research for the request, it was determined that there were some items that should be fixed as bug fixes, so that work is in progress. There has been some work done to date and the rest of this work is targeted for completion by the end of September. Qwest can bring this back to this group or work with Desktop Media to get this request closed.

Dan Buseti/Qwest — pointed out that there was one functionality issue in RCE where the difference between Line Share and Line Split for the flow in RCE was not being correctly determined. He noted that Qwest fixed that in a bug fix. Then there was an issue in the LMOS line record, where Line Share and Line Split was not being correctly differentiated. He noted that there were less than 200 records that weren't correct. He confirmed that the old records were fixed and an interim measure was added to make sure that there would be no additional problems. He indicated that the fix was going in on September 27, 2002.

Bonnie Johnson/Eschelon — asked if even though the CR says that the products impacted indicated all UNE-P, this is specific to line split and line share.

Dan Buseti/Qwest – Yes.

Mike Buck/Qwest — Noted that Qwest can get this CR updated. I think it's fair to say the status of this CR is in development, and when it's deployed on the 27th, Qwest will seek to move it to CLEC Test. We can bring it back next month or work off line with Desktop Media to close this CR if the group is comfortable with that.

There was no dissent in the room or on the phone to work off line with Desktop Media.

SCR081602-01 Pre-order transaction CSR Retrieval lacking pertinent response information – (Originated by WorldCom)

Qwest Wholesale Change Management Process (CMP) Meeting Minutes

Liz Balvin/WorldCom presented CR. WorldCom believes that critical fields are not populated. The fields of concern are: Directory Delivery Information, Directory Listings information, Feature and Feature Details, Blocking information, Alpha Numeric listing Identifier, any DID Hunting, Signaling or Channel Type information, PIC or LPIC information, NC, NCI, SECNCI Code information, and Yellow pages heading information. She noted that there was a clarification call and that she believes that Qwest was clear on what the request was.

Mike Buck/Qwest —said that Qwest understands the request and has provided an LOE. This CR is eligible for IMA 13.0 and the status will be updated to Pending Prioritization.

SCR082202-01 Allow Coin UNEP orders to be processed through IMA– (Originated by Ernest Group)

Mike Buck/Qwest—presented this CR on behalf of Ernest Group who was not in attendance. In the clarification call it was determined that this was a duplicate of Qwest initiated CR 30212. 30212 had gone through prioritization numerous times and was ranked very low. In the call, the thought was that a CLEC initiated CR might be prioritized higher, so Qwest agreed to withdraw their CR to let this one move forward.

Jonathan Spangler/AT&T asked if this is one of the LSOG issues Qwest presented

Connie Winston/Qwest said no. This CR was to add UNE-P PAL.

Liz Balvin/WorldCom asked if it is currently being ordered via fax or some other manner.

Connie Winston/Qwest said it is ordered via IIS.

Mike Buck/Qwest asked if there were any other questions. There were none. This status will be changed to Pending Prioritization for IMA 13.0 and Qwest has provided the LOE in the CR response.

SCR082802-01 Change process surrounding EDI Implementation "requirements review activities (Originated by WorldCom)

Liz Balvin/WorldCom said that the existing process for EDI's question log seemed a bit inefficient to WorldCom. She reviewed that the current process called for Qwest to respond verbally and for WorldCom to type the response in the populated column of the question log, and return it to Qwest to verify that response. The WorldCom proposed change is to have Qwest populate those responses and send them back to WorldCom so that there was no miscommunication on what was meant by Qwest's response.

Wendy Green/Qwest described the reason for the existing process was so that when Qwest provided a response, there was assurance that the CLEC understand the process well enough to document the answer themselves. She noted that Qwest thought that this was a pretty good process but that Qwest understands WorldCom's concerns. Due to the large volume of questions they are asking the process can become cumbersome. Wendy Green/Qwest reviewed the proposed language change to the Implementation Guide provided in the CR Response.

Liz Balvin/WorldCom said that language is acceptable to WorldCom.

Wendy Green/Qwest noted that the revised document is targeted to be published on October 3rd.

Mike Buck/Qwest stated that the status of the CR was in Development. Upon posting of the document on October 3rd the status will change to "CLEC Test" if there was a desire to review this at the October meeting. Otherwise, it could be updated "Completed" if that's the approach everyone wishes to take.

Liz Balvin/WorldCom said that she was comfortable with it being documented as soon as possible and stated that once the volume is reduced she doesn't want the process to revert back to the old way.

Bonnie Johnson/Eschelon noted that Eschelon is in the middle of EDI development as well. She asked Wendy Green/Qwest if the new process is available to anybody interested in adopting this process.

Wendy Green/Qwest indicated that it was.

Micki Jones/WorldCom asked if Qwest finds that the majority of the CLECs choose to implement this, would Qwest be willing to change the guidelines?

Wendy Green/Qwest said certainly. If it turns into the standard process Qwest would want the implementation guide to reflect what we are doing with the majority of our CLECs.

Qwest Wholesale Change Management Process (CMP) Meeting Minutes

Mike Buck/Qwest asked if there was a desire to bring this back next month and discuss this further or should Qwest go ahead and close this at that point.

Liz Balvin/WorldCom commented that if a number of CLECs are using it now, then maybe we could see what process works best. Maybe a culmination of ideas may give us the best approach. She noted that WorldCom thought that the process they requested was the most efficient way for them. She suggested that maybe we can leave it in CLEC Test for a month or so and see how others respond.

Mike Buck/Qwest indicated that the status would be updated to CLEC Test upon deployment and the CR could be reviewed at the October meeting.

SCR082902-01 Circuit ID on MONSERV file (MN only) – (Originated by Eschelon)

Kathy Stichter/Eschelon reviewed the issue with the BillMate. She indicated that this is only applicable in Minnesota. She indicated that Eschelon uses the Circuit ID to identify and validate their USOCs and Qwest uses the MAN Number. Eschelon would like to have the column that is now populated with the MAN Number, populated with the Circuit ID.

Liz Balvin/WorldCom—asked if there is a reason why Eschelon only wanted it in Minnesota. WorldCom was looking at having it across the board.

Kathy Stichter/Eschelon indicated that it's in all of the other Eschelon States already, just not in Minnesota.

Bonnie Johnson/Eschelon noted that Eschelon doesn't do business in all 14 Qwest States

Mike Buck/Qwest stated that Qwest understands the request and has provided a response and LOE and is currently in the process of evaluating scheduling opportunities for this request.

Jonathan Spangler/AT&T said that he assumed this does affect a couple of states, maybe Qwest give us that detail.

Jeff Thompson/Qwest noted that the CLECs would like to see this broadened if at all possible. He asked if Eschelon would be willing to broaden this request. Qwest understands that this may need to be broadened to accommodate other states.

Connie Winston/Qwest said either Eschelon could remove the state specific indication on their CR or another CR can be opened to work the issue.

Bonnie Johnson/Eschelon asked if Kathy would be willing to remove the state specific requirement from the CR.

Kathy Stichter/Eschelon said that would be no problem

Liz Balvin/WorldCom asked Eschelon which Circuit ID is being requested..

Kathy Stichter/Eschelon said the Qwest Circuit ID.

Jeff Thompson/Qwest said that Qwest does provide Circuit ID on private line bills, and this CR will provide for Unbundled Loop. This request could also be broadened to all Products and for all 14 States.

Carla Pardee/AT&T asked if Monserv affects all the other billing systems or is it just a BillMate specific change?

Jeff Thompson/Qwest said that it's just BillMate. We had to do this for the paper bill as well and then it would populate it on down. Eschelon is a BillMate user, so their desire is for BillMate to support this.

Mike Buck/Qwest asked if there are other comments/questions? There were none. He indicated that the status of the CR would be updated to Presented. Qwest will provide an update to the LOE, if required, based upon the scope changes discussed.

Attachment C New CRs Initiated by Qwest

No CRs for Inclusion

Attachment D – Regulatory & Industry Guideline CRs

No CRs for Inclusion

Attachment E - CROSS OVER CHANGE REQUESTS

Qwest Wholesale Change Management Process (CMP) Meeting Minutes

SCR070202-1X Time & Material Repair Charges invoice process. (Crossover CR PC070202-1X) – Originated by Eschelon

Mike Buck/Qwest said that this CR was already discussed as part of the “Synergy” discussion held at the Product & Process meeting. The CR has been successfully crossed-over. Qwest and Eschelon held another clarification call and formulation of an LOE is still in progress. There were no additional questions.

Attachment F - NEW “WALK ON” CHANGE REQUESTS

SCR090302-01 Eschelon is requesting that the sunset date of IMA 10.0 be extended for 120 days to August 18th, 2003 – Originated by Eschelon

Bonnie Johnson/Eschelon reviewed the CR. She said that she will resubmit as an Exception CR and won't make it date specific and would like the IMA 10.0 sunset date pushed out as far as possible.

Terry Wicks/Allegiance said that Allegiance supports this CR as well. We are not planning to migrate to 11.0 so we need to maintain on 10.0 for a little longer.

Liz Balvin/WorldCom said that WorldCom's exception CR essentially asks for 2 of the CRs that have been prioritized for IMA 12.0 to be implemented by the end of 2002. Qwest indicated that to accomplish what WorldCom wanted would require a major release. In that case Qwest would need to support 10.0, 11.0, 12.0 and the new major release. As a result there would be 4 EDI platforms out there. Qwest indicated that was not an option and that they would have to get 10.0 off of the hardware platform to make room for another release.

Jeff Thompson/Qwest said that's basically correct. IMA 10.0 & 11.0 would retire much earlier than the current plan.

Liz Balvin/WorldCom asked if it would be sooner than the May timeframe that Qwest has in place right now.

Jeff Thompson/Qwest said that is correct.

Terry Wicks/Allegiance — said that since this request changes the documented process this is required to be an exception CR. In the clarification call Bonnie Johnson/Eschelon indicated that she will re-submit it requesting a change without specifying a date.

Mike Buck/Qwest thanked Eschelon for initiating the request far enough in advance so that the exception process can be fully used.

Micki Jones/WorldCom—it's my understanding that with 11.0, there are certain CR that are supporting the OBF LSOG 6 business rules, however there is the other layer of EDI version, so as you do LSOG version there is an equivalent EDI version that gets upgraded. In some other areas we've brought in some of the business rules of the upcoming LSOG releases without changing the EDI version. Is there any consideration for 11.0 bringing in the business rules without changing the EDI version underneath it?

Connie Winston/Qwest — All the re-numbering and re-mapping for EDI is being done in IMA 11.0 based upon the outcome of the CLEC vote. When the CLEC vote indicated that an LSOG 6 change was wanted, that's how the renumbering was done.

Micki Jones/WorldCom —confirmed that IMA 10.0 is on EDI version 40/20 and IMA 11.0 is going to be on 40/30. So you are basically moving the EDI version to LSOG 6 and Qwest is a groundbreaker because they are the only one in the industry who is doing that. She asked whether or not it was a requirement, in order to do the LSOG 6 change requests, a CLEC must do the EDI, they can't bring that in on the LSOG 5, the 4020 version of EDI, you must go to 4030 is what Qwest is saying?

Connie Winston/Qwest said that it was voted by CMP to do it that way.

Micki Jones/WorldCom — asked if everyone who voted on it that way understood that it was changing the EDI version as well as the business rules?

Connie Winston/Qwest said yes.

Attachment G - CRs to Consider forFOR CLOSURE

SCR012202-1 Incorrect Consolidation of DR5 USOC in IMA – (Originated by Qwest)

Qwest Wholesale Change Management Process (CMP) Meeting Minutes

24652 Unbundled DID/PBX Trunk Port Facility move from LS to PS – (Originated by Qwest)

30212 Add New UNE-P PAL to IMA withdrawn in place of earlier CR (Originated by Qwest)

SCR013002-5 PIC Freeze Documentation – (Originated by Qwest)

Mike Buck/Qwest said that these CRs have not received a great deal of support in previous votes. Qwest is seeking to withdraw. This does not preclude anyone from picking these CRs up if it's functionality you are interested in. Connie Winston/Qwest said that #3 was picked up by Ernest Group as a new CR. (discussed earlier). There was no request to change sponsorship of any of these CRs. The status of these CRs will be updated to "Withdrawn."

5498578 Ability to send dual CFA information on an LSR for HDSL orders – (Originated by WorldCom)

Liz Balvin/WorldCom — said that this CR was submitted to ask Qwest to provide dual CFA capabilities and Qwest was willing to support it. The request would have made the secondary CFA field an optional field for HDSL orders only. WorldCom has chosen to move away from this because it was specific to HDSL orders.

Mike Buck/Qwest asked if anyone was interested in picking this up.

Jonathan Spangler/AT&T — said that initially when WorldCom submitted this, what was the purpose of the CR?

Liz Balvin/WorldCom — IMA only allowed for a single CFA field and CLECs would have to only provide the first piece and on the FOC back Qwest would response with the secondary CFA info. That was not easily trackable from WorldCom's perspective.

Mike Buck/Qwest asked again if anyone wanted to take ownership of the CR. Based on lack of response, the CR will be updated to "Withdrawn."

SCR061902-01 CLLI code on UNE-P & UNE Loop MONSERV file and paper bill (originated by Eschelon)

Mike Buck/Qwest — indicated that Qwest has offered a response on this change request, which is provided in the distribution. He indicated that the response is a denial on the approach that Eschelon would like to proceed with. Qwest did offer an alternative approach, which is also indicated in the request. He asked if Jeff had any other comments on the request or if Eschelon has any other questions.

Jeff Thompson/Qwest — noted that Qwest had written the denial based upon the fact that this was a relatively expensive request. Qwest had looked at alternative ways to provide this functionality and came up with a proposal that they could provide the data via a separate file on the web. We reviewed that alternative with Eschelon. Eschelon determined that the solution would not work for them and preferred Qwest to proceed with the original request. Qwest is denying the Eschelon approach based on the cost. He noted that if anyone was interested in having the functionality that Qwest proposed, Qwest could still proceed with the alternative.

Kathy Stichter/Eschelon — asked if Bill Markert/Eschelon decided that he did want to go forward with the alternative, could Eschelon submit a new CR?

Jeff Thompson/Qwest said yes, a new CR could be submitted.

Kathy Stichter/Eschelon said thank you.

SCR090601-1 Request that UNE-P orders to be billed on a CABS bill (originated by AT&T)

Mike Buck/Qwest said that this is an AT&T request that has been implemented and still has outstanding items.

Jeff Thompson/Qwest said that Qwest has been delivering bills for 3 months, there have been a series of issues with the bill each month and Qwest has fixed those. I believe that we are down to a rounding error that we understand and are working to get fixed but do not have a date on that. And we still have an out of balance condition that again, we are working to fix.

Carla Pardee/AT&T said that she agrees with that assessment, the paper bills are not balancing with the CABS bill, and the CSR detail is not matching completely. It's not a huge difference, but it still is a difference that we need to correct. She added that in the CLEC forum, both Carl Sear and Alan Zimmerman acknowledged that it's still under development and the paper bill remains the bill of record. AT&T is anxious for the CABS bill and the IABS bill to become the bill of record and they do not want to continue to get the paper bill and rely on that. She noted that it does look like we're close and she appreciates all of Qwest's efforts and she hopes that we can close this out. It is an issue that is getting some regulatory attention because it does keep AT&T out of several markets.

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Jeff Thompson/Qwest said that Qwest does offer an electronic bill of record but it's the EDI bill. Carla is asking for the BOS bill to be the bill of record.

Mike Buck/Qwest said that this would remain in CLEC Test.

5464735 Eliminate delay due to error message indicating CFA in use, when it is not (Originated by Eschelon)

Mike Buck/Qwest noted that Bonnie Johnson/Eschelon had indicated that this was OK to be updated to "Completed."

Bonnie Johnson/Eschelon confirmed that he was correct.

5522887 More effective and accurate loss/completion reports (Originated by Eschelon)

Connie Winston/Qwest said this CR is one on which there were some questions around the ACT of D. Qwest did meet with Eschelon off line, and Qwest thought there could have been several issues on the loss and completion report. We did find one 'people' issue, we talked to that person. They simply input the incorrect PON and we've talked to them and that's been cleared up. The other issues all result around ACT of D across different product types. Qwest defined that an ACT of D would be an external loss. From Eschelon's perspective it appears that if they initiated the activity of D, it's not an external loss to them. They would have thought that it would have had an internal indicator. AT&T was also interested in this discussion.

Jonathan Spangler/AT&T — asked for clarification as to what came out of that discussion between Qwest and Eschelon regarding the ACT of D and if there were any conclusions that came out of that discussion.

Bonnie Johnson/Eschelon said that the original CR was to have the loss report really truly identify losses, customers that have left Eschelon and have gone to another local service provider. This is really critical in UNE POTS and resale, because Eschelon is not notified via the LSR to release the number. So the loss report is the only report that Eschelon can depend on to be certain that we quit billing the customer. Our initial expectation was that this final step was taken to indicate internal vs. external. Last month, we determined that there is a different view of what was internal vs. external. It's Eschelon's feeling that if we initiate a disconnect of any type, whether it is a partial disconnect or a full disconnect, whether it's a C order, a D order, regardless of the order type, that we view that as internal because we initiated it. All we want to show up as external are those losses that we did not initiate. I think that we just need, at this point in time, to move forward and determine impacts to other CLECs, and whether it impacts everybody. AT&T seems to be the only other CLEC that uses the loss and completion reports. We don't want to impact other CLEC's process and how they use the report, so if there is agreement with other CLECs, I'll submit a new CR to change the definition of internal and external.

Jonathan Spangler/AT&T — and your request for changing that would define an actual internal loss meaning an order that was initiated by the CLEC just to change one of their customer features, or move orders.

Bonnie Johnson/Eschelon — it would clearly state that external only applies when the customer is only actually changing local service providers via an LSR request from another carrier.

Jonathan Spangler/AT&T — AT&T agrees with that definition. Can Qwest elaborate on what they define a loss as being, because AT&T has always assumed that that was the case. By definition, a loss would be that the CLEC was losing that customer and therefore be able to utilize the information that was on the loss report to be able to disconnect billing on that customer.

Connie Winston/Qwest — from Qwest retail perspective a disconnect is considered a line loss. So it is considered a loss. So loss to revenue stream and things like that constitutes a loss. When this CR went into this definition, Qwest thought an ACT of D results in lost customers, lost revenue, so it's a loss. The customer could have new connected with another CLEC, or they have gone to another state, things like that can happen, that's where that definition came from. Bonnie's explanation is also understandable, that's why we discussed the new CR to change the definition.

Jonathan Spangler/AT&T — I can understand the Qwest position too because essentially, except for in a move situation where the customer's TNs aren't really changing, if they are within the same switch, the account wouldn't necessarily change.

Connie Winston/Qwest — in all of the ones we've researched it has been a true ACT of D. Eschelon indicated that they haven't had the "Move" situation, but they would look into that.

Bonnie Johnson/Eschelon — for us, for Centrex plus account, if they're moving from one common block to another there will be one C to move and one C to add. There are occasions for Eschelon when a customer might be moving. The customer might change from resale to facility based. Eschelon uses the loss report to determine if it is appropriate to stop billing our customer. Eschelon wants to ensure that there aren't other CLECs that are using these reports for a different purpose. Bonnie indicated that

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she would submit a new CR and then if there is anybody who would have an objection to that or uses these reports for a different reason, that that would come out when she submitted the CR.

Jonathan Spangler/AT&T — I still think AT&T would be in favor of the CR that Bonnie is suggesting. Essentially AT&T is looking at that report as being a customer literally leaving AT&T.

Liz Balvin/WorldCom — I think WorldCom is using it in the same manner as well. We'll be sure to get with our folks when the new CR is initiated and see if there are any issues. But I believe we are using it as Eschelon has described.

Mike Buck/Qwest stated that Qwest will be looking for a new CR and that this one will be updated to Completed knowing that there is a new CR is on the way.

Bonnie Johnson/Eschelon — yes

25497 Provide Pending Service Order S&E to CLECs [Include summary USOC(s) in FOC – (Originated by Qwest)]

Connie Winston/Qwest indicated that this was deployed as part of IMA 10.1 and has been in CLEC Test.

Bonnie Johnson/Eschelon said that. Eschelon looks at every PSN to review the Service Order that was issued by Qwest, identifying any errors vs. what was sent. This allows us to identify customer impacting errors prior to the due date so we can stop the train wreck before it happens. It's very useful, and we track all the data and open up an escalation ticket to get the service order corrected.

Connie Winston/Qwest said that Qwest believes this is ready for closure

Bonnie Johnson/Eschelon said that as we do go through this process, and have any problems, we are looking at a couple of things like on those service orders where the hunting is at the bottom of the service order that possibly is cut off and sometimes the PSN isn't available. Would we bring those issues to Jean Novak/Qwest?

Connie Winston/Qwest said yes, because before this candidate was implemented, we had some parsing problems on the service order completion record that we were sending out in the Central Region. When you brought that issue in through service management we actually had an opportunity to review it. Sometimes when we run into parsing problems, everything looks perfect until you get to the bottom of one particular order. It did some strange thing to our code that we hadn't expected and it allows us to trouble shoot and if it needs to be turned into a trouble ticket then we'll open one.

A question was asked whether you have to sign up for the new functionality.

Connie Winston/Qwest said that yes, via your User Profile.

Liz Balvin/WorldCom asked if this is available through both GUI & EDI

Connie Winston/Qwest said yes. It follows your user profile.

Mike Buck/Qwest asked if there were any objections on the phone or on the bridge to updating the status of this CR to "Completed." There was no objection. The status will be updated to "Completed."

Attachment H - GLOBAL ACTION ITEMS

There were no Global Action Items

Attachment I —ACTION ITEMS AND ASSOCIATED CRs

5043176 Better Explanations of OCCs on Invoices – (Originated by Eschelon)

Michael Buck/Qwest indicated that Eschelon had requested that status be provided on this CR. According to some recently completed work, Qwest believes this CR should be updated to "CLEC Test."

Kathy Stichter/Eschelon said that the issue is that the USOCs are still not showing in the Western region

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Jeff Thompson/Qwest said that the reason this stayed open is that the work had been done previously in Eastern/Central. Qwest believes it has completed this work for Western in the first part of September. Qwest would like Eschelon to go back and look at your bills to determine if the work is completed.

Kathy Stichter/Eschelon said that she will check bills this month and provide feedback.

Mike Buck/Qwest said indicated that the status of the CR would be updated to CLEC Test with review in October for completion. The action item is closed.

SCR012802-1 Loss and Completion Reports , TNs should appear on both reports for the same date —(Originated by Eschelon)

Connie Winston/Qwest said that the matrix is attached and we've included LOEs. As we've discussed before, the Loss & Completion team is a small development team and as they have bandwidth they start to take the changes into their development cycle. The target is by the end of 1st quarter next year. Their goal is to do them sooner but since they never know when spikes will happen in CLEC requests for contractual changes they don't like to have any hard commitments on those dates because those are their first priority. This work is their second priority, but they have begun work on this.

Bonnie Johnson/Eschelon said that she has asked folks at Eschelon to track any differences between records on the loss and completions reports. As we've discussed before, it could show up on the report a couple of days before or after depending on which one errored. So, if I get any feedback on where it's happening, I'll provide that information. It's my understanding that if one errors it would never be more than two or three days, so we should see the respective match to it sometime three before or three days after.

Connie Winston/Qwest — And as Qwest discovers other things causing that condition we'll add them to the matrix and start to block those changes into the development team.

Jonathan Spangler/AT&T asked if on the ones that Qwest has identified on this report, what sort of percentage did these incorporate as far as what you had identified in your research.

Connie Winston/Qwest said that the percentage of errors in the total bucket was very low. That doesn't mean that it doesn't cause the CLECs a lot of pain when it happens. The percentage of errors included in the matrix, on the other hand, should be fairly high.

Mike Buck/Qwest said that the action is still open and ongoing status will be provided.

SCR031402-04 (Extension of LSS System hours to be available after 8:00 PM MST)

Connie Winston/Qwest said that are newer dates that are a little bit more firm. Communication has been sent regarding the conversion process for the Central region. There have been signification issues with this listing system. We still cannot commit to 10:00 p.m. but the extension to 9:00 p.m. is okay. Once into production with the opportunity to stabilize, it is still possible to extend to 10 p.m. But it is just not possible to commit until it's in production and stabilized. The last conversion is scheduled for the end of November. We will be completely to the new system by the time we put in our IMA release in November. So hopefully by November or December CMP meetings there will be a more suitable answer. Obviously with date slips there are struggles. There has to be a clean conversion. This is the listings database. So the conversion is very, very important. The conversion is the top priority right now so I apologize that there is not a solid answer yet on extending hours.

Donna Osborne-Miller/AT&T asked what stabilization looks like for this team.

Connie Winston/Qwest said that going into production and making sure there are no Sev 1s or 2s outstanding against that system. Once there are no Sev 1s or Sev 2s, once the system is operating as designed, and as it's supposed to, then they will take a look at it. We generally give it 30 days to stabilize. Much like the CLEC Test window.

Sharon VanMeter/AT&T —once everything has stabilized you still can't commit?

Connie Winston/Qwest said no. We'll ask the listings team again next month. We think once they get into the cycle of production, and get on the bigger production machines, they can finish their batch work and still stay up to 10:00pm but they are just not ready to commit yet.

Sharon VanMeter/AT&T—when will we get an answer of yes or no.

Connie Winston/Qwest stated that we are kind of leading them to believe the answer has to be yes and we need to work towards it. Connie stated that she thinks that might be why it's taking so long. Otherwise they would probably just tell us "No".

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Donna Osborne-Miller/AT&T asked if they are going to come up in November. Based on your experience, is it a 30 or 60-day window to look and see after the November deployment?

Connie Winston/Qwest said that we are encouraging them to extend it as quickly after they deploy as possible. I would say, realistically, by January we would definitely know. I'm hoping we can let you know by November/December. Remember the first deployment was for July, so they have been struggling. We have CLEC commitments through the night. That batch window is other CLEC commitment.

LeiLani Hines/WorldCom asked if the times go with the zones or is there one central time?

Connie Winston/Qwest said that it is 10:00 Mountain time

Mike Buck/Qwest asked if there were any other questions or comments. This Action Item will remain open.

SCR040302-01 (View 1000 circuits within IMA)

Connie Winston/Qwest stated that this CR is in the 12.0 definition phase right now. When an originating CLEC is called for extra clarification or to make sure that the actual definition is in line with their expectations, we bring that conversation to the Monthly CMP meeting. The purpose is to ensure that everybody is on the same page with how we're defining this for the next release. We have a CLEC request to do View 1000 CFAs in IMA. We are going to implement that in a post order functionality, and we wanted to make sure with the originating CLEC that that was OK. It was fine with them. They just really want this for a review purpose. We wanted to make sure, since it was voted fairly high, that it was an OK definition for everybody else. There were no comments on the phone or in the room.

SCR042902-02 (OBF EMI 110125 for Toll Free Calling)

Mike Buck/Qwest said that the Action Item on this CR was to provide a status update on the target deployment date. This CR has a target implementation date of November 14, 2002

Kathy Stichter/Eschelon said thank you.

Mike Buck/Qwest said that this Action Item will be updated to closed.

SCR043002-01 (Lift the Name and Address field requirement on CSR retrieval)

Connie Winston/Qwest said that in definition on the name and address field requirement on the CSR retrieval, the notes had reference to pre-order and order. Qwest clarified with the originating CLEC that their expectation was for "pre-order" only. This Action Item is to make sure that we brought it to the entire CMP community.

Liz Balvin/WorldCom wanted to clarify that this request is the one that seeks not only the lifting of the name and address field but once the CSR is retrieved, that Qwest is only going to respond with the active CSR.

Connie Winston/Qwest said Yes

Liz Balvin/WorldCom also said that WorldCom has had some issues with CSRs that actually list multiple accounts as live. How is Qwest determining the actual active account.

Connie Winston/Qwest said that live accounts would be displayed since we can't necessarily make that determination. Now we do still have SANO as a requirement but not full name and full address. So we would try to do a SANO validation. If that matched both of them, we would not make that choice for you and we would not hide from you that there are two options there. We would you to make that determination. That is rare but Qwest is not saying that it could never happen.

Bonnie Johnson/Eschelon - couldn't the one customer have two active accounts up at one time due to posting? So then you would have to make the determination, which was the most recent?

Connie Winston/Qwest said that it shouldn't stay live. When another live one comes, the other one should go away. That's the goal. When that isn't successful, we would not hide one of them from you and make that determination by ourselves with the system. We would tell you that there are two active live accounts.

Liz Balvin/WorldCom- I sort of have a side bar question. I think we've talked about this before, I just want to make sure I'm clear regarding the customer code. I know that's returned on the CSR but is customer code required for the order?

Connie Winston/Qwest — Qwest definitely recommend that you provide the customer code.

John Gallegos/Qwest - that's correct but there is not a hard edit

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Liz Balvin/WorldCom — What is the logic for assigning customer code? I believe Customer Codes increment by 100.

Connie Winston/Qwest — no, there is different logic for different order types

Bonnie Johnson/Eschelon — could you publish that please? It would help to identify if you come across two CSR

MickiJones/WorldCom- if not required to put Customer Codes on order, how do you determine which one to put on account?

Connie Winston/Qwest — it falls out to manual handling

Liz Balvin/WorldCom — the highest increment would be the active account?

Connie Winston/Qwest — No, not necessarily.

Bonnie Johnson/Eschelon — it could be lower or higher

Liz Balvin/WorldCom — The logic for customer code assignment would be very helpful. Also, when is a Customer Code generated? For every change or only when they migrate?

Connie Winston/Qwest — it is at origination, but we can provide that information.

Mike Buck/Qwest — Are there any other questions? There were no questions on the phone or in the room. This action item will be closed, the CR will of course remain open, and a new action item will be created to answer the questions on Customer Code.

SCR061802-02 (Separate Local End Office Usage and Shared Transport Usage on UNE-P BillMate files.)

Jeff Thompson/Qwest said that the LOE is about 6,000 hrs and is a fairly significant piece of work. Qwest is still trying to get a target date provide the scheduling info when it's available.

Kathy Stichter/Eschelon said thanks, I'd appreciate that.

Liz Balvin/WorldCom said that we've never really had a prioritization for billing before, and I'm curious if this, with the level of man-hours, would require that going forward.

Jeff Thompson/Qwest said when I say it's significant I mean that the issue is that it's touching multiple sub-systems. Scheduling the work in all the sub-systems is a matter of coordination that requires meetings and discussion with all those sub-systems. Those efforts are underway. It's not a matter of being able to do the work, it's a matter of getting all of the systems to work together. This could be #1 in priority and we would still be in the same bucket.

Mike Buck/Qwest asked if there were any other questions and there were none.

WORLDCOM EXCEPTION CR:

Meeting minutes for SCR082302-01EX have been provided via the mailouts process in notice CMPR.09.24.02.F.01328.CMP_ExceptionCR_Vote. The exception minutes are also published at <http://www.qwest.com/wholesale/cmp/teammeetings.html>.

QWEST EXCEPTION CR:

Meeting minutes for SCR091002-01EXRG have been provided via the mailouts process in notice CMPR.09.25.02.F.01329.CMP_CR_Mtg_Vote. The exception minutes are also published at <http://www.qwest.com/wholesale/cmp/teammeetings.html>.

WALK ONS:

Walk On Item #1

Connie Winston/Qwest — spoke about the E-Data CR that was introduced last month. After further investigation it was determined that it's a gateway change that won't have any systems impacts. Qwest is proposing withdrawing this CR and we will deal with it as a level 2 Product/Process notification. Are there any objections?

Jeff Thompson/Qwest — the change will involve a URL change. It involves moving from the IXC to the SDG site, moving to the new site will require loading a new digital certificate. There may be some cases where your current login and password may not be sufficient, so there may be cases when your login will need to be changed as well.

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LeiLani Hines/WorldCom — Is it a crossover into product process?

Mike Buck/Qwest — What I'm hearing is that this will be more appropriate as a level 2 change which is not a CR. Are there any objections or concerns?

Nods of acceptance in the room

Walk On Item #2

Wendy Green/Qwest—the 11.0 disclosure walk through was held. It was scheduled for 10 days but took only 1½ hours. So in the meeting it was discussed scheduling it for one day instead of 10. The people in the room were ok with that.

Jeff Thompson/Qwest — I believe the feed back was that it's more appropriate to have the meeting during the mid-point of the 10-day schedule rather than have the meetings at the front end of the 10-day period. Doing so would allow participants more time to digest the documents.

Judy Schultz/Qwest —I'll take that as an action item to redesign to make sure we don't run into any conflicts with the Change Management Process document.

Walk On Item #3

Liz Balvin/WorldCom — last month Qwest (Connie) talked about migrate as specified

Connie Winston/Qwest — the "D" vs. not intending to put the "D" on. What we were saying was that we would not enforce the "D". If you put nothing we will out that product. The understanding of the intent of the CR is that you will tell us what you want

Liz Balvin/WorldCom — and what is the field

Wendy Green/Qwest — it's the feature activity field

There were no other walk-ons.

Next Meeting Schedule

Next Monthly Systems CMP Meeting will be held on October 17, 2002 at 1801 California.

Meeting End Time: 11:25 a.m.

ATTACHMENT A

CMP Meeting Attendee List

September 2002 Monthly Systems CMP Meeting

Thursday, September 19, 2002

Company Name	Full Name	Attendance	Phone Number	E-mail address	POC Type
Accenture	Powell, Mark	On Phone	(612) 277-0857	mark.r.powell@accenture	Primary
Allegiance	Coleman, Ian J.	On Phone	469 259 4361	ian.coleman@algx.com	
Allegiance	Wicks, Terry	In Person	(469) 259-4438	terry.wicks@algx.com	Primary
AT&T	Bahner, Terry	In Person	(303) 298-6149	tbahner@att.com	
AT&T	Osborne-Miller, Donna	In Person	(303) 298-6178	dosborne@att.com	Primary
AT&T	Pardee, Carla	In Person	(303) 298-6101	cdickinson@att.com	Tertiary
AT&T	Scherer, Esther	In Person	(303) 298-6228	escherer@att.com	
AT&T	Spangler, Jonathan	In Person	(303) 298-6240	jfspangler@att.com	
AT&T	Van Meter, Sharon	In Person	(303) 298-6041	svanmeter@att.com	Secondary
Covad	Cutcher, Minda	In Person	(978) 649-4565	mcutcher@covad.com	Tertiary
Cox Communications	Ball, Delynn	On Phone	(999) 999-9999	POC Data Unpublished	
Eschelon	Cherminow, Todd	On Phone	(999) 999-9999	POC Data Unpublished	
Eschelon	Issacs, Kim	On Phone	(999) 999-9999	POC Data Unpublished	
Eschelon	Johnson, Bonnie	In Person	(612) 436-6218	bjohnson@eschelon.com	Primary
Eschelon	Skaff, Candy	On Phone	(999) 999-9999	POC Data Unpublished	
Eschelon	Stichter, Kathy	On Phone	(612) 436-6022	kstichter@eschelon.com	
Idaho PUC	Hart, Wayne	On Phone	(999) 999-9999	POC Data Unpublished	
Integra	Ambrose, Scott	On Phone	(253) 867-1063	scott.ambrose@integrate	Secondary
McLeodUSA	Whitson, Carol	On Phone	(999) 999-9999	POC Data Unpublished	
NCTelecom	Wilson, Linda	On Phone	(970) 878-0477	lindaw@nctelecom.com	Secondary
NightFire Software	Carias, Bob	In Person	(510) 500-1256	bcarias@nightfire.com	Primary
POPP	Padula, Sarah	On Phone	(999) 999-9999	POC Data Unpublished	Primary
Qwest	Buck, Mike	In Person	(303) 294-1633	mjbuck@qwest.com	Tertiary
Qwest	Busetti, Dan	In Person	(999) 999-9999	POC Data Unpublished	
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Qwest	Green, Wendy	In Person	(999) 999-9999	POC Data Unpublished	
Qwest	Harmon, Jana	On Phone	(999) 999-9999	POC Data Unpublished	
Qwest	McNa, Sue	On Phone	(999) 999-9999	POC Data Unpublished	
Qwest	Novak, Jean	In Person	(999) 999-9999	POC Data Unpublished	
Qwest	Owen, Randy	On Phone	(999) 999-9999	POC Data Unpublished	
Qwest	Peterson, Lydell	In Person	(999) 999-9999	POC Data Unpublished	
Qwest	Robertson, Lillian	On Phone	(999) 999-9999	POC Data Unpublished	
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Qwest	Thompson, Jeff	On Phone	(999) 999-9999	POC Data Unpublished	
Qwest	Veik, Gary	In Person	(999) 999-9999	POC Data Unpublished	
Qwest	Winston, Connie	In Person	(999) 999-9999	POC Data Unpublished	
Time Warner Telecom	Flanigan, Alan	In Person	(303) 566-5877	alan.flanigan@twtelecom	Primary
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USLink	Pickar, Julie	In Person	(218) 568-2039	julie.pickar@uslink.com	Tertiary
VarTec	Avila, Monica	On Phone	(214) 424-4406	mavila@vartec.net	Secondary
WorldCom	Balvin, Liz	In Person	(303) 217-7305	Liz.Balvin@wcom.com	Primary
WorldCom	Jones, Micki	On Phone	(999) 999-9999	POC Data Unpublished	
WorldCom	Hines, LeiLani	In Person	(303) 217-7340	Leilani.jean.Hines@wcom.com	Secondary
Z-Tel	Reith, Michael	On Phone	(999) 999-9999	POC Data Unpublished	

The information contained in this report is based upon CMP Point of Contact (POC) data for CMP Monthly Meeting attendees who announce themselves on the bridge or who sign in on the CMP Meeting Attendance List.

Complete CMP Point of Contact (POC) information can be viewed in the POC reports available at <http://www.qwest.com/wholesale/cmp/poc.html>

Updates to POC information (e.g. Phone Number, e-mail address, etc) can be made online at <http://www.qwest.com/wholesale/cmp/ppform.html>

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